

**Appendix G7**  
***Air Quality - Air Quality Analyses of Operating and  
FSRU Startup Emissions - Criteria Air Pollutants***

***G7-1 California Environmental Quality Act Air Quality  
Impact Assessment of the BHP Cabrillo Deepwater  
Port LNG Import Terminal***

***G7-2 Air Quality Impact Assessment of the Startup  
Operations at the BHP Cabrillo Deepwater Port LNG  
Import Terminal***

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**G7-1**

**California Environmental Quality Act Air Quality Impact  
Assessment of the BHP Cabrillo Deepwater Port LNG  
Import Terminal**



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# **California Environmental Quality Act Air Quality Impact Assessment of the BHP Cabrillo Deepwater Port LNG Import Terminal**

prepared for:

**BHP Billiton**

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## **SUMMARY**

BHP Billiton LNG International, Inc. (BHP), EPA Region IX (EPA), and the California State Lands Commission (State Lands) are currently assessing the impacts of the proposed Cabrillo Port Offshore LNG Import Terminal (Cabrillo Port). An ambient air impacts analysis was prepared as part of the December 30, 2003 permit application. The modeling has been refined several times to reflect improved project design elements and additional refinements to the analysis that were requested by EPA and other reviewers. The following modeling analysis was prepared to update the ambient air impacts analysis to reflect BHP's latest refinements to the emission rates and operating assumptions.<sup>1</sup>

The modeling analysis is based on predicted maximum Cabrillo Port emissions. NO<sub>x</sub>, SO<sub>2</sub>, CO, and PM<sub>10</sub>/PM<sub>2.5</sub> emissions from the stationary sources (including the support vessels and LNG carriers in District and Federal waters) were modeled using the EPA-approved Offshore and Coastal Dispersion (OCD) Model. The overwater receptor grid extended approximately 22 miles up and down the coast from the FSRU. The overland receptor grid extended two miles inland from the shoreline between Oxnard and Point Dume, and receptors were also placed at 100 meter intervals along the shoreline from Point Dume to the Palos Verdes Peninsula in the South Coast Air Basin (SoCAB). Worst-case impacts were determined at both onshore and offshore receptors. Ambient impacts at the worst-case onshore receptor for each pollutant were well below the federal significance thresholds. For example, NO<sub>2</sub> and PM<sub>10</sub> levels at the worst-case onshore receptor are expected to be less than five percent of the applicable significance thresholds. Based upon this modeling, Cabrillo Port will not materially impact onshore air quality and will not cause or contribute to onshore ambient air quality standard violations.

## **1.0 AIR QUALITY IMPACT ANALYSIS**

### **1.1 AIR QUALITY MODELING METHODOLOGY**

As for the original air quality impact analysis performed for the project in the permit application, this update to the air quality impact analysis used the OCD Model. The offshore meteorological data set used by the model is identical to that used in the December 2005 air quality impact analysis, and had previously been expanded and updated from the three-year data set originally used.<sup>2</sup> The meteorological data set consists of data collected during 2000–2004 by the National Oceanic and Atmospheric Administration (NOAA) at Buoy Station 46025 – Santa Monica Basin. Mixing heights were set to 500 meters and relative humidity was set to 80%. The original ambient air impacts analysis had been further revised to include potential effects of platform downwash using the same FSRU dimensions that were used for the screening analysis for ammonia impacts. The OCD model was recompiled to allow the use of up to 50,000 receptors per run. No changes to the model or meteorological data have been made since the December 2005 submittal.

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<sup>1</sup> Revised emissions estimates were submitted under separate cover.

<sup>2</sup> Onshore, Ventura-Emma Wood State Beach (from Ventura County Air Pollution Control District); offshore, NOAA Buoy Station 46025.

## **1.2 PROJECT EMISSIONS**

Estimates of the Project's emissions were included in the December 2005 Minor New Source Review Construction Permit application. In September 2006, Project emission estimates were revised to reflect responses to comments provided to BHP by reviewers. The changes to the emissions inventory were outlined in our September 21 data gap response. The revised emission rates were used in this air quality impact analysis. Other major changes to the modeling analysis since the previous report are as follows:

- LNG carrier pumping emissions have been allocated to the FSRU for modeling purposes.
- At E&E's request, emissions sources on the FSRU have been disaggregated so that multiple identical units (such as the main generators and the submerged combustion vaporizers) are modeled with individual stacks.
- As discussed in the September 21 data gap response, two different LNG carrier sizes have been addressed.

Table 1-1 below summarizes the revised emissions from the sources located on the FSRU and from vessel operations in District and federal waters.

The activity data on which these emissions calculations are based have been provided to the agencies by the applicant under separate cover. These activity data were the basis for calculation of emissions over shorter periods to allow comparison of modeled impacts with short-term ambient air quality standards. These data were also the basis for allocation of emissions to various source locations for modeling. The emission rates used in the modeling analysis are documented in the appendix.

## **1.3 AIR QUALITY IMPACT ANALYSIS**

### **1.3.1 Receptor Locations**

The overwater receptor grid extended approximately 22 miles up and down the coast from the FSRU. The overland receptor grid extended two miles inland from the shoreline with additional receptors in the Oxnard area. Additional receptors were placed along the shoreline of the South Coast Air Basin from Point Dume to the Palos Verdes peninsula.

Receptors have been excluded from a 500-meter exclusion zone surrounding the FSRU. Under federal law (33 CFR 165.2 Subpart C, Safety Zones), a safety zone is an area "to which for safety or environmental purposes, access is limited to authorized persons, vehicles, or vessels. It may be stationary and described by fixed limits or it may be described as a zone around a vessel in motion." The Applicant has requested from the U.S. Coast Guard a safety zone with a radius of 500 meters from the outer edge of the FSRU. If the project is approved, the safety zone will be added to navigation charts as a limited access area only, established in accordance with 33 CFR Part 150. Only LNG carriers bound for the FSRU and service and supply vessels associated with the FSRU and LNG carrier operations would be allowed to enter the safety zone. By federal law,



**Table 1-1  
Cabrillo Port Operational Emissions Summary**

Description	Emissions, tons per year				
	NO <sub>x</sub>	ROC	CO	SO <sub>2</sub>	PM <sub>10</sub> /PM <sub>2.5</sub> <sup>a</sup>
<b>Stationary Source (FSRU)</b>					
Wartsila 9L50DF Main Generators	12.2	24.5	20.8	0.08	8.1
Wartsila 9L50DF Backup Generator	1.9	0.3	0.2	0.01	0.1
Submerged Combustion Vaporizers	48.9	3.5	148.9	0.33	3.8
Emergency Fire Pump and Generator	3.0	0.4	1.9	<0.01	0.1
Freefall Lifeboat	<0.1	<0.1	<0.1	<0.01	<0.1
Diesel Fuel Storage Tank	--	0.03	--	--	--
LNG Carrier Pumping	9.4	2.7	6.6	<0.01	0.4
<b>Total Stationary Source</b>	<b>75.4</b>	<b>31.4</b>	<b>178.4</b>	<b>0.42</b>	<b>12.6</b>
<b>Marine Vessels, District Waters<sup>b</sup></b>					
Tug Supply Boats	0.22	0.09	0.21	0.001	0.01
Crew Boat	0.06	0.03	0.06	0.000	0.00
<b>Subtotal, District Waters</b>	<b>0.28</b>	<b>0.12</b>	<b>0.27</b>	<b>0.002</b>	<b>0.02</b>
<b>Marine Vessels, Federal Waters<sup>c</sup></b>					
Tug Supply Boats	27.1	11.6	25.9	0.17	1.5
Crew Boat	0.8	0.3	0.8	0.01	<0.01
LNG Carrier	21.1	6.1	14.9	0.01	0.9
<b>Subtotal, Federal Waters</b>	<b>49.0</b>	<b>18.0</b>	<b>41.6</b>	<b>0.2</b>	<b>2.5</b>

Notes: a. All PM<sub>10</sub> assumed to be PM<sub>2.5</sub>.  
b. District waters extend approximately 3.5 miles from shoreline.  
c. Federal waters extend from the District water boundary to approximately 25 miles from shoreline.

the general public would no longer have access to this area. The safety zone would be rigorously patrolled to prevent the incursion of unauthorized personnel.

This exclusion is consistent with the December 19, 1980 letter from Douglas Costle to Senator Jennings Randolph stating that an "exemption from ambient air is available only for the atmosphere over land owned or controlled by the source and to which public access is precluded by a fence or other physical barriers." This exemption was further clarified in an April 30, 1987 letter from G.T. Helms of OAQPS to Steve Rothblatt, Chief of the Region V Air Division, stating that receptors must be placed in a river that is a public waterway because it is not controlled by the source. However, the letter also lays out the conditions under which the adjacent riverbank may be excluded from ambient air: "[t]he riverbank must be clearly posted and regularly patrolled by plant security. It must be very clear that the area is not public." Because the safety zone is an area that will be controlled by the source, clearly posted on navigational charts, and rigorously patrolled, the general public will not have access to the area and the safety zone is not considered

to be ambient air. This approach is consistent with the way in which EPA Region 6 handled the safety zone for the El Paso Energy Bridge (now, Gulf Gateway Energy Bridge). In that situation, EPA recognized that the general public is excluded from the safety zone and so the area within the safety zone does not meet the definition of "ambient air."

### **1.3.2 Results of the Air Quality Impact Analysis**

Results of the air quality modeling analysis are summarized in Tables 1-2 and 1-3. Table 1-2 compares the maximum modeled concentrations from project emissions to the PSD significance thresholds and Class II increments. The time, date, and location of the modeled maximum impact for each pollutant and averaging period are shown in Attachment 1.<sup>3</sup> Table 1-2 shows that the maximum project impacts for all pollutants and averaging periods occur at sea. Table 1-2 also shows that with the exception of annual average impacts, maximum modeled impacts of the project in the South Coast Air Basin are less than half of the maximum modeled onshore impacts. With the exception of annual average NO<sub>2</sub>, all project impacts are well below all significance thresholds. The area in which the modeled annual average NO<sub>2</sub> concentrations exceed the significant impact level extends less than 2,000 meters to the east of the Coast Guard exclusion zone, immediately adjacent to the FSRU and located over 10 miles from any onshore receptors. Modeled impacts for all pollutants and averaging periods are much lower onshore.

Table 1-3 shows the maximum modeled onshore impacts from the project combined with representative background pollutant concentrations, and compare these total projected impacts with the state and federal ambient air quality standards. Background concentrations in these tables have been updated to reflect the highest values monitored during the period 2000 through 2004. These results show that emissions from the proposed FSRU would not cause or contribute to any violations of any state or federal ambient air quality standard. EPA has stated that it is its longstanding policy to use significant impact levels to determine whether a proposed new or modified source will cause or contribute significantly to a violation of the national ambient air quality standards (NAAQS) or PSD increments. If a source's maximum impacts are below the significant impact levels, then the source is judged to not cause or contribute significantly to a NAAQS or increment violation. As the Project's onshore impacts are well below the significant impact levels for each pollutant, the Project will not cause or contribute to a NAAQS or increment violation.

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<sup>3</sup> Because OCD does not have the capability of performing ozone limiting calculations automatically, the maximum one-hour average NO<sub>x</sub> concentration calculated for each meteorological data year was converted to NO<sub>2</sub> using the maximum hourly ozone concentration monitored at El Rio for the corresponding year. See attached table for ozone values and calculations.

**Table 1-2**  
**Comparison of Maximum Modeled Project Impacts with PSD Significance Thresholds and Class II Increments (Stationary Sources and Marine Vessels, Including LNG Carriers)**

Pollutant	Avg Period	Max. Modeled Offshore Impact ( $\mu\text{g}/\text{m}^3$ )	Max. Modeled Onshore Impact ( $\mu\text{g}/\text{m}^3$ )	Max. Modeled Impact in SoCAB ( $\mu\text{g}/\text{m}^3$ )	PSD Significance Threshold ( $\mu\text{g}/\text{m}^3$ )	PSD Class II Increment ( $\mu\text{g}/\text{m}^3$ )
NO <sub>2</sub>	1-hour <sup>a</sup>	187.9	43.7	14.3	--	--
	annual	3.6	0.03	0.03	1.0	25
SO <sub>2</sub>	1-hour	0.7	0.1	0.04	--	--
	3-hour	0.6	0.05	0.02	25	325
	24-hour	0.1	0.05	0.02	5	91
	annual	0.02	<0.01	<0.01	1.0	20
CO	1-hour	313.9	65.4	19.6	2,000	--
	8-hour	186.0	7.1	2.6	500	--
PM <sub>10</sub> /PM <sub>2.5</sub>	24-hour	2.0	0.2	0.05	5	30
	annual	0.3	<0.01	<0.01	1.0	17

Note: a. 1-hour average NO<sub>x</sub> converted to NO<sub>2</sub> using highest 1-hour average ozone concentration during the corresponding calendar year. See attached table.

**Table 1-3**  
**Comparison of Maximum Modeled Project Onshore Impacts with Ambient Air Quality Standards (Stationary Sources and Marine Vessels, including LNG Carriers)**

Pollutant	Avg Period	Max. Modeled Onshore Impact ( $\mu\text{g}/\text{m}^3$ )	Background Conc. ( $\mu\text{g}/\text{m}^3$ ) <sup>a</sup>	Total Impact ( $\mu\text{g}/\text{m}^3$ )	State Standard ( $\mu\text{g}/\text{m}^3$ )	Federal Standard ( $\mu\text{g}/\text{m}^3$ )
NO <sub>2</sub>	1-hour	43.7	139.1	182.8	470	--
	annual	0.03	26	26	--	100
SO <sub>2</sub>	1-hour	0.1	39.3	39.4	655	--
	3-hour	0.05	39	39	--	1,300
	24-hour	0.05	23.5	23.5	105	365
	annual	<0.01	10.7	10.7	--	80
CO	1-hour	65.4	8,280	8,345	23,000	40,000
	8-hour	7.1	4,000	4,007	10,000	10,000
PM <sub>10</sub>	24-hour	0.2	127.2	127.4	50	150
	annual	<0.01	29	29	20	50
PM <sub>2.5</sub>	24-hour	0.2	32 <sup>b</sup>	32	--	65
	annual	<0.01	13	13	12	15

Notes: a. Background values from El Rio monitoring station (Station ID No. 061113001).

b. 24-hour average background value for PM<sub>2.5</sub> based on 98<sup>th</sup> percentile.

The District consists of both attainment and nonattainment areas. Anacapa Island and San Nicolas Island are within the District boundaries and are designated as attainment for all federal standards. The portion of the County on the mainland is designated as a moderate nonattainment area for ozone and as an attainment area for all other federal standards. The Project is essentially the same distance from Anacapa Island as the mainland. In Figures 1-1 through 1-4 it can be seen that the impacts to Anacapa Island from the combined FSRU source and marine vessel emissions are less than or equal to the impacts on the mainland for all pollutants. Therefore, this report focuses on impacts to the mainland.

Table 1-2 shows that the maximum project impacts for all pollutants and averaging periods occur at sea. Modeled impacts for all pollutants and averaging periods are much lower onshore. Figures 1-1 through 1-4 show the modeled impacts of one-hour and annual  $\text{NO}_2$  and 24-hour and annual  $\text{PM}_{10}/\text{PM}_{2.5}$  from the stationary sources on the FSRU and the associated marine vessel activity in the vicinity of the project. Figure 1-5 shows the locations of the receptors used in the modeling analysis upon which Figures 1-1 through 1-4 are based. Figure 1-6 shows the locations of the receptors used to evaluate impacts of the project in the South Coast Air Basin.

Figures 1-7 through 1-10 show the modeled impacts of one-hour and annual  $\text{NO}_2$  and 24-hour and annual  $\text{PM}_{10}/\text{PM}_{2.5}$  from the stationary sources on the FSRU and the associated marine vessel activity along the coastline of the South Coast Air Basin and compare these modeled impacts to the California and national ambient air quality standards.

## **2.0 ASSESSMENT OF SIGNIFICANCE**

### **2.1 SIGNIFICANCE COMPARISON TABLES**

In the following tables, the maximum onshore ambient air quality impacts of the Cabrillo Port LNG facility are compared with the relevant federal concentration-based significance criteria for each pollutant.

#### **2.1.1 Nitrogen Dioxide**

Table 2.1 compares the onshore NO<sub>2</sub> impacts from the proposed Project with the ambient air quality standards and the Class I and Class II significant impact levels for NO<sub>2</sub>. EPA specifies that a major source will not be considered to cause or contribute to a violation of a national ambient air quality standard if the ambient impacts attributable to that major source are less than or equal to the Class II significance levels at any locality that does not or would not meet the applicable national standard. 40 CFR § 51.165(b)(2). Ventura County, in its entirety, is an attainment area for the federal NO<sub>2</sub> standard. Impacts below the significant impact levels demonstrate that the Project will have inconsequential impacts to onshore air quality.

Comparison of the modeling results at the worst-case receptors to the significant impact levels indicates that the Project will not have a material effect upon air quality. None of the onshore impact levels exceed the Class II NO<sub>2</sub> significance level of 1.0 µg/m<sup>3</sup>; maximum predicted impacts are more than an order of magnitude below the significance threshold. Therefore, the facility is not expected to cause or contribute to an onshore violation of the NO<sub>2</sub> ambient air quality standard.

**Table 2-1  
Assessment of Significance for Onshore Impacts of Oxides of Nitrogen**

<b>Measure of Significance</b>	<b>Level</b>	<b>Concentration, µg/m<sup>3</sup></b>
National AAQS	100 µg/m <sup>3</sup>	0.03
Class II SIL	1.0 µg/m <sup>3</sup>	0.03
Class II increment	25 µg/m <sup>3</sup>	0.03
Class I SIL	0.1 µg/m <sup>3</sup>	0.03
Class I increment	2.5 µg/m <sup>3</sup>	0.03

#### **2.1.2 Ozone**

There are no approved air quality models for evaluating the ozone impacts of an individual project. However, the OCD modeling results and the unique attributes of the proposed Project demonstrate that there is insignificant potential for the proposed Project to impact the onshore ozone nonattainment area.

The proposed Project's onshore NO<sub>2</sub> impacts are too small to materially contribute to ozone formation. The proposed Project's annual NO<sub>2</sub> impacts are only 3% of the Class II significant impact level.

Based upon the minimal NO<sub>2</sub> impacts that will be experienced at the shoreline, the proposed Project is not expected to cause or materially contribute to any onshore violation of the ozone standard.

### 2.1.2 Carbon Monoxide

Table 2-2 compares the CO emission impacts from the proposed project with the ambient air quality standards and the Class II significant impact levels. EPA specifies that a major source will be considered to cause or contribute to a violation of a national ambient air quality standard if the ambient impacts attributable to that major source exceed the Class II significance levels at any locality that does not or would not meet the applicable national standard. 40 CFR § 51.165(b)(2). Ventura County, in its entirety, is an attainment area for the federal CO standards. Impacts below the significant impact levels demonstrate that the Project will have inconsequential impacts to onshore air quality.

A comparison of the modeling results at the worst-case receptors to the significant impact levels indicates that the Project will not have a material effect upon air quality. None of the impact levels exceed the CO significance levels of 500 µg/m<sup>3</sup> (8-hour average) or 2,000 µg/m<sup>3</sup> (1-hour average). Therefore, the facility is not expected to cause or contribute to any onshore violation of the CO ambient air quality standard.

**Table 2-2**  
**Assessment of Significance for Onshore Impacts of Carbon Monoxide**

Measure of Significance	Level	Concentration, µg/m <sup>3</sup>
National AAQS – 1 hr	40,000 µg/m <sup>3</sup>	65.4
National AAQS – 8 hr	10,000 µg/m <sup>3</sup>	7.1
Class II SIL – 1 hr	2,000 µg/m <sup>3</sup>	65.4
Class II SIL – 8 hr	500 µg/m <sup>3</sup>	7.1

### 2.1.3 Sulfur Dioxide

Table 2-3 compares the modeled SO<sub>2</sub> emission impacts from the proposed Project to the ambient air quality standards and the Class I and Class II significant impact levels. EPA specifies that a major source will be considered to cause or contribute to a violation of a national ambient air quality standard if the ambient impacts attributable to that major source exceed the Class II significance levels at any locality that does not or would not meet the applicable national standard. 40 CFR § 51.165(b)(2). Ventura County, in its entirety, is an attainment area for the federal SO<sub>2</sub> standards. Impacts below the significant impact levels demonstrate that the Project will have inconsequential impacts to onshore air quality.

A comparison of the modeling results at the worst-case receptors to the significant impact levels indicates that the Project will not have a material effect upon air quality. None of the impact levels exceed the Class II SO<sub>2</sub> significance levels of 1 µg/m<sup>3</sup> (annual average), 5 µg/m<sup>3</sup> (24-hour average) or 25 µg/m<sup>3</sup> (3-hour average). Therefore, the facility is not expected to cause or contribute to any onshore violation of the SO<sub>2</sub> ambient air quality standard.

**Table 2-3**  
**Assessment of Significance for Onshore Impacts of Sulfur Dioxide**

Measure of Significance	Level	Concentration, $\mu\text{g}/\text{m}^3$
National AAQS – 3 hr	1300 $\mu\text{g}/\text{m}^3$	0.05
National AAQS – 24 hr	365 $\mu\text{g}/\text{m}^3$	<0.01
National AAQS – annual	80 $\mu\text{g}/\text{m}^3$	<0.01
Class II SIL – 3 hr	25 $\mu\text{g}/\text{m}^3$	0.05
Class II SIL - 24 hr	5 $\mu\text{g}/\text{m}^3$	<0.01
Class II SIL – annual	1.0 $\mu\text{g}/\text{m}^3$	<0.01
Class I SIL - 3 hr	1.0 $\mu\text{g}/\text{m}^3$	0.05
Class I SIL - 24 hr	0.2 $\mu\text{g}/\text{m}^3$	<0.01
Class I SIL – annual	0.1 $\mu\text{g}/\text{m}^3$	<0.01

#### 2.1.4 Fine Particulates

Table 2-4 compares the ambient  $\text{PM}_{10}$  emission impacts from the proposed Project to the ambient air quality standards and the Class I and Class II significant impact levels. EPA specifies that a major source will be considered to cause or contribute to a violation of a national ambient air quality standard if the ambient impacts attributable to that major source exceed the Class II significance levels at any locality that does not or would not meet the applicable national standard. 40 CFR § 51.165(b)(2). Ventura County, in its entirety, is an attainment area for the federal  $\text{PM}_{10}$  and  $\text{PM}_{2.5}$  standards. Impacts below the significant impact levels demonstrate that the Project will have inconsequential impacts on onshore air quality.

A comparison of the modeling results at the worst-case receptors to the significant impact levels indicates that the Project will not have a material effect upon air quality. None of the impact levels exceed the Class II  $\text{PM}_{10}$  significance levels of 1  $\mu\text{g}/\text{m}^3$  (annual average) or 5  $\mu\text{g}/\text{m}^3$  (24-hour average). While significance levels have yet to be developed for  $\text{PM}_{2.5}$ , the combination of onshore attainment status and the extremely low ambient impacts indicates that the proposed Project will have an insignificant effect upon air quality. Therefore, the facility is not expected to cause or contribute to any onshore violation of the  $\text{PM}_{10}$  or  $\text{PM}_{2.5}$  ambient air quality standards.

**Table 2-4**  
**Assessment of Significance for Onshore Impacts of Fine Particulates (PM<sub>10</sub>)**

Measure of Significance	Level	Concentration, µg/m <sup>3</sup>
National AAQS - 24 hr	150 µg/m <sup>3</sup>	0.2
National AAQS – annual	50 µg/m <sup>3</sup>	<0.01
Class II SIL -24 hr	5 µg/m <sup>3</sup>	0.2
Class II SIL – annual	1 µg/m <sup>3</sup>	<0.01
Class I SIL - 24 hr	0.3 µg/m <sup>3</sup>	0.2
Class I SIL – annual	0.2 µg/m <sup>3</sup>	<0.01

**Table 2-5**  
**Assessment of Significance for Onshore Impacts of Fine Particulates (PM<sub>2.5</sub>)**

Measure of Significance	Level	Concentration, µg/m <sup>3</sup>
National AAQS - 24 hr	65 µg/m <sup>3</sup>	0.2
National AAQS – annual	15 µg/m <sup>3</sup>	<0.01

## 2.2 AMBIENT AIR QUALITY IMPACTS

As shown in the modeling results presented in Section 1, the maximum ambient impacts attributable to the proposed Project for all pollutants and averaging periods except annual NO<sub>2</sub> are expected to be less than the significant impact levels at the worst-case receptors. Impacts will be lower still onshore. As a result, the operation of the proposed Project will not cause or contribute to exceedances of the NAAQS for any pollutant. Accordingly, the Cabrillo Port LNG Terminal will not have a material impact on onshore ambient air quality.

## 2.3 OVERALL ASSESSMENT OF SIGNIFICANCE

The analysis of impacts on air quality offshore within 22 miles of the facility and onshore between Oxnard to the north and the Palos Verdes Peninsula to the south shows that the operation of the Cabrillo Port LNG Terminal will not cause or contribute to violations of the NAAQS. Further, the onshore impacts are not considered to be significant when compared with relevant measures of significance.



## **Attachments**

**Documentation for Emissions Calculations**  
**Release Parameters for FSRU Sources**  
**Emission Rates and Stack Parameters for FSRU Sources**  
**Maximum Hourly Emissions for Tug Main Generators**  
**Maximum Hourly Emissions for Tug Auxiliary Generators**  
**Maximum Hourly Emissions for Crew Boat Main Generator**  
**Maximum Hourly Emissions for Crew Boat Auxiliary Generator**  
**Maximum Hourly Emissions from Small LNG Carrier**  
**Maximum Hourly Emissions from Large LNG Carrier**  
**Vessel Emissions and Activity in District Waters**  
**Vessel Emissions and Activity in Federal Waters**  
**Release Parameters for Support Vessels**  
**Stack Parameters for Vessel Activity**



## **Documentation for Emissions Calculations**

### **FSRU Sources**

#### **Main Generators**

- hourly emissions from “FSRU Table 5”, FSRU operational Version 6 9-15-06.xls
- annual emissions from “FSRU Table 2”, FSRU operational Version 6 9-15-06.xls

#### **Vaporizers**

- one-hour and 3-hour averages from FSRU Table 11, FSRU operational Version 6 9-15-06.xls (7.5 units in operation for emissions calculations; modeled as 8 physical units)
- eight-hour average emission rates calculated as 6 hours with 7.5 units operating plus two hours with 4 units operating; modeled as 8 physical units
- 24-hour average from FSRU Table 10, FSRU operational Version 6 9-15-06.xls (4 units in operation for emissions calculations; modeled as 4 physical units)
- annual emissions from “Table FSRU 9”, FSRU operational Version 6 9-15-06.xls

#### **Emergency Generator**

- hourly and annual emissions from “FSRU Table 14”, FSRU operational Version 6 9-15-06.xls
- based on 1 hour/day and 100 hours/yr of operation

#### **Fire Pump Engine**

- hourly and annual emissions from “FSRU Table 13”, FSRU operational Version 6 9-15-06.xls
- based on 1 hour/day and 100 hours/yr of operation

#### **Life Boat**

- hourly and annual emissions from “FSRU Table 15”, FSRU operational Version 6 9-15-06.xls
- based on 1 hour/day and 50 hours/yr of operation

#### **Backup Generator**

- annual emissions from “Table FSRU 7”, FSRU operational Version 6 9-15-06.xls

#### **LNG Carrier (pumping)**

- hourly and annual emissions from “Table FSRU 16”, FSRU operational Version 6 9-15-06.xls

## Vessels

### Assist Tugs, Crew Boat and LNG Carrier

- Maximum hourly emissions for each engine and vessel type were calculated from Tables FW 2, FW 3, FW 5, FW 6, FW 8 and F9 of Federal Waters version 9-29-06.xls by setting the load factor in cell B9 of each table to 100%. The resulting full load hourly emission rates are shown on the attached copies of the modified tables.
- Actual hourly emission rates for each vessel type were calculated using the engine loads shown in the table notes for “Support Vessels in District Waters” and in the table body for “Vessel Emissions and Activity in Federal Waters.”

For example, full load NO<sub>x</sub> emissions for tug supply mains are 55.24 lb/hr and for tug supply gens is 0.173 lb/hr. Hourly NO<sub>x</sub> emissions for assist tugs in FW1, based on 51% load on the main engines and 50% load on the generators, is calculated as:

$$(0.51 * 55.24) = (0.50 * 0.173) = 28.26 \text{ lb/hr}$$

- Emission rates for other averaging periods were calculated using the persistence factors in the following table:

Vessel Activity by Area During the Startup Period	
Vessel Type/Area	Assumed Activity
<b><i>Averaging Period: 1 hour</i></b>	
Assist Tugs, District Waters	none
Crew Boat, District Waters	½ hour
Assist Tugs, FW1	none
Crew Boat, FW1	½ hour
Assist Tugs, FW2	1 hour
LNG Carrier, FW2	1 hour
Crew Boat, FW2	none
Assist Tugs, FW3	none
LNG Carrier, FW3	none
<b><i>Averaging Period: 3 hours</i></b>	
Assist Tugs, District Waters	none
Crew Boat, District Waters	1 hour
Assist Tugs, FW1	none
Crew Boat, FW1	1 hour
Assist Tugs, FW2	3 hours
LNG Carrier, FW2	3 hours
Crew Boat, FW2	1 hour
Assist Tugs, FW3	none
LNG Carrier, FW3	none

### Vessel Activity by Area During the Startup Period

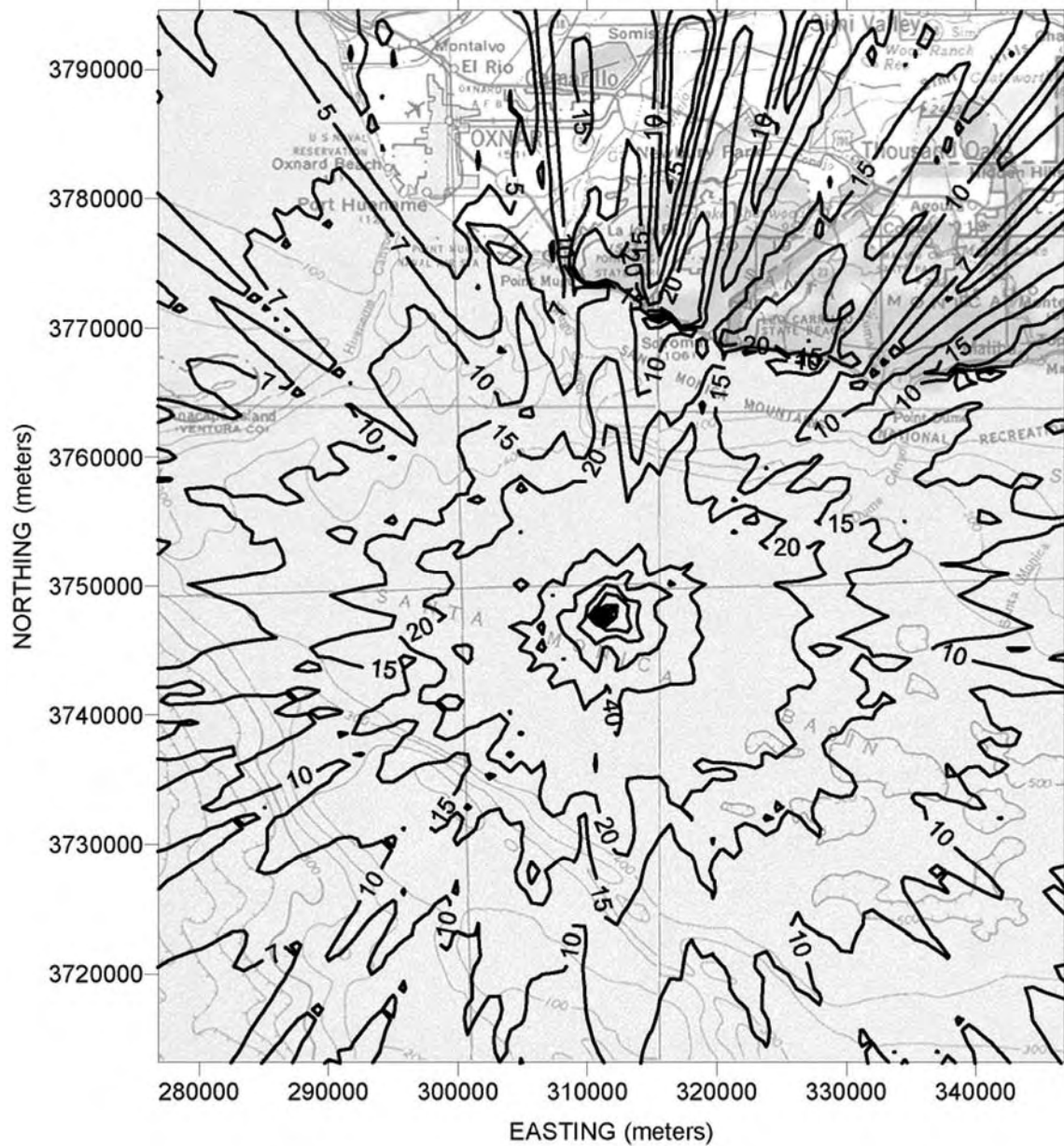
Vessel Type/Area	Assumed Activity
<b><i>Averaging Period: 8 hours</i></b>	
Assist Tugs, District Waters	none
Crew Boat, District Waters	1.05 hour
Assist Tugs, FW1	none
Crew Boat, FW1	2 hours
Assist Tugs, FW2	8 hours
LNG Carrier, FW2	8 hours
Crew Boat, FW2	5 hours
Assist Tugs, FW3	none
LNG Carrier, FW3	none
<b><i>Averaging Period: 24 hours</i></b>	
Assist Tugs, District Waters	none
Crew Boat, District Waters	1.05 hour
Assist Tugs, FW1	none
Crew Boat, FW1	2 hours
Assist Tugs, FW2	24 hours
LNG Carrier, FW2	24 hours
Crew Boat, FW2	5 hour
Assist Tugs, FW3	none
LNG Carrier, FW3	none
<b><i>Averaging Period: Annual</i></b>	
Assist Tugs, District Waters	52 hours
Crew Boat, District Waters	208 hours
Assist Tugs, FW1	104 hours
Crew Boat, FW1	396 hours
Assist Tugs, FW2	8419 hours
LNG Carrier, FW2	1614 hours
Crew Boat, FW2	990 hours
Assist Tugs, FW3	163 hours
LNG Carrier, FW3	455 hours

- For the LNG carrier, the highest short-term emissions will occur during the larger vessel visits. The highest annual average emissions will occur when smaller carriers are used because more vessel calls (and therefore greater service vessel activity) would be required to deliver the quantity of LNG that can be processed by the FSRU in a year. Carrier impacts will be highest when the vessels are closer to shore, so for short-term averaging periods it was assumed that the carrier was at the FSRU rather than traveling through FW3.

Short-term LNG carrier emissions were calculated from the larger carrier emission rates, from Table FW9, Federal Waters version 9-29-06.xls. For example, while within the Safety Zone (FW2), the LNG carrier has an average load factor of 4.42%. Therefore, 1-hour and 8-hour average CO emissions are calculated as 4.42% of the full-load hourly CO emission rate for the large carriers:

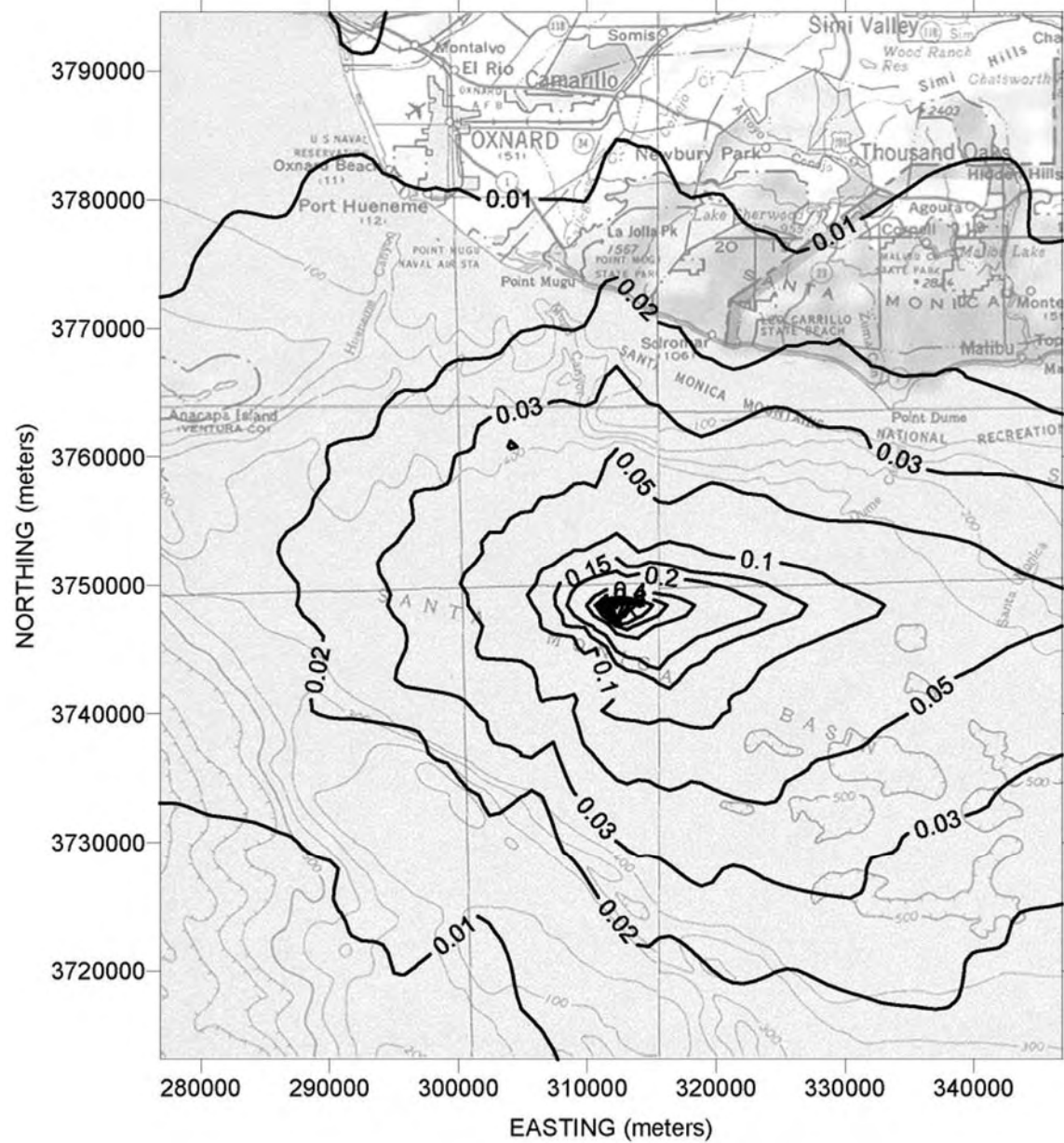
$$0.0442 * 137.1 \text{ lb/hr} = 6.06 \text{ lb/hr}$$

**Figure 1**  
**BHP Cabrillo LNG Deepwater Port**  
**One-Hour Average NO<sub>x</sub> Impacts: FSRU Sources and Marine Vessels**  
**Maximum Modeled Impacts**



Note: Lines show contours of constant concentration; impacts are in units of  $\mu\text{g}/\text{m}^3$ .

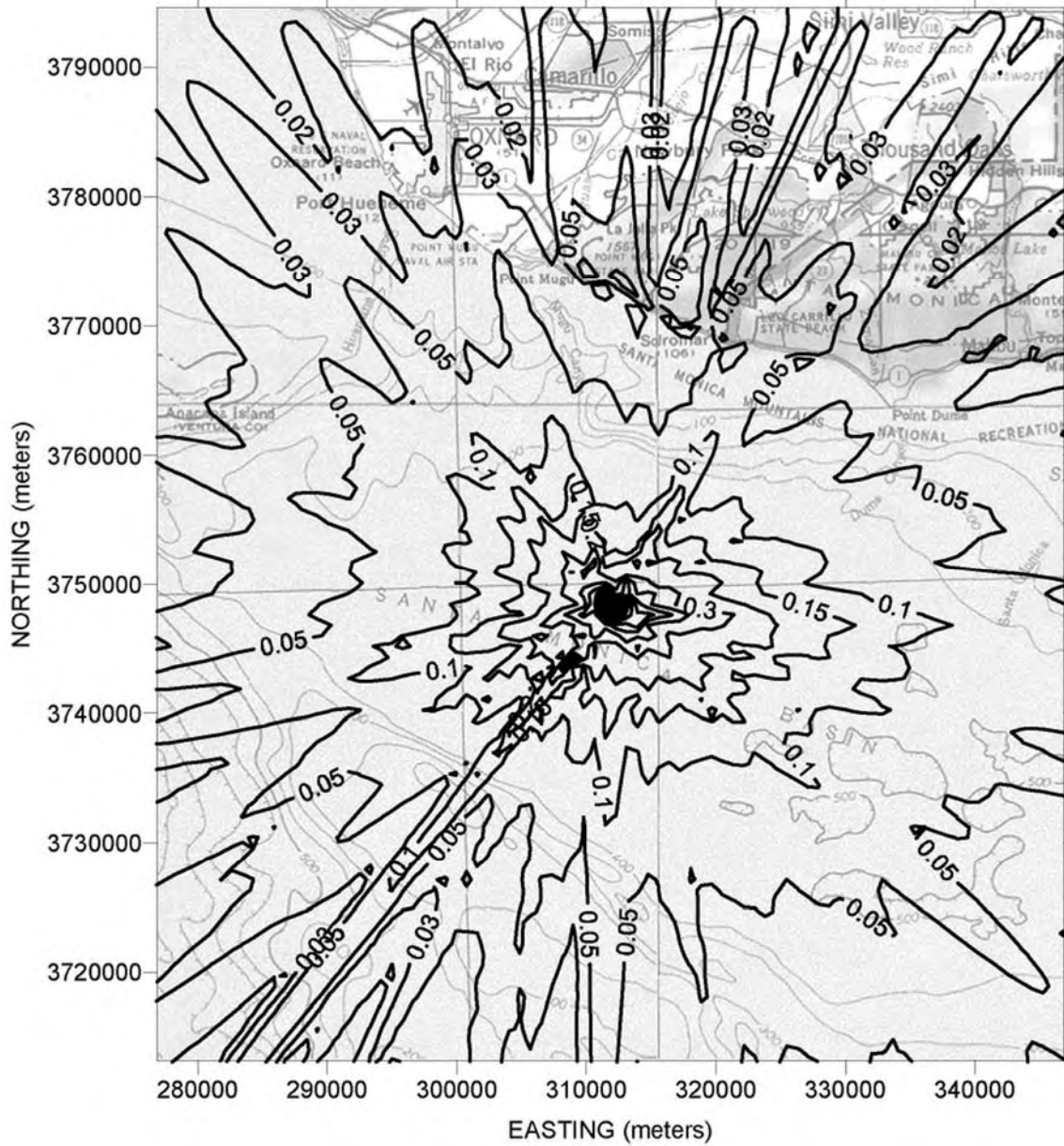
**Figure 2**  
**BHP Cabrillo LNG Deepwater Port**  
**Annual Average NO<sub>x</sub> Impacts: FSRU Sources and Marine Vessels**  
**Maximum Modeled Impacts**



Note: Lines show contours of constant concentration; impacts are in units of  $\mu\text{g}/\text{m}^3$ .

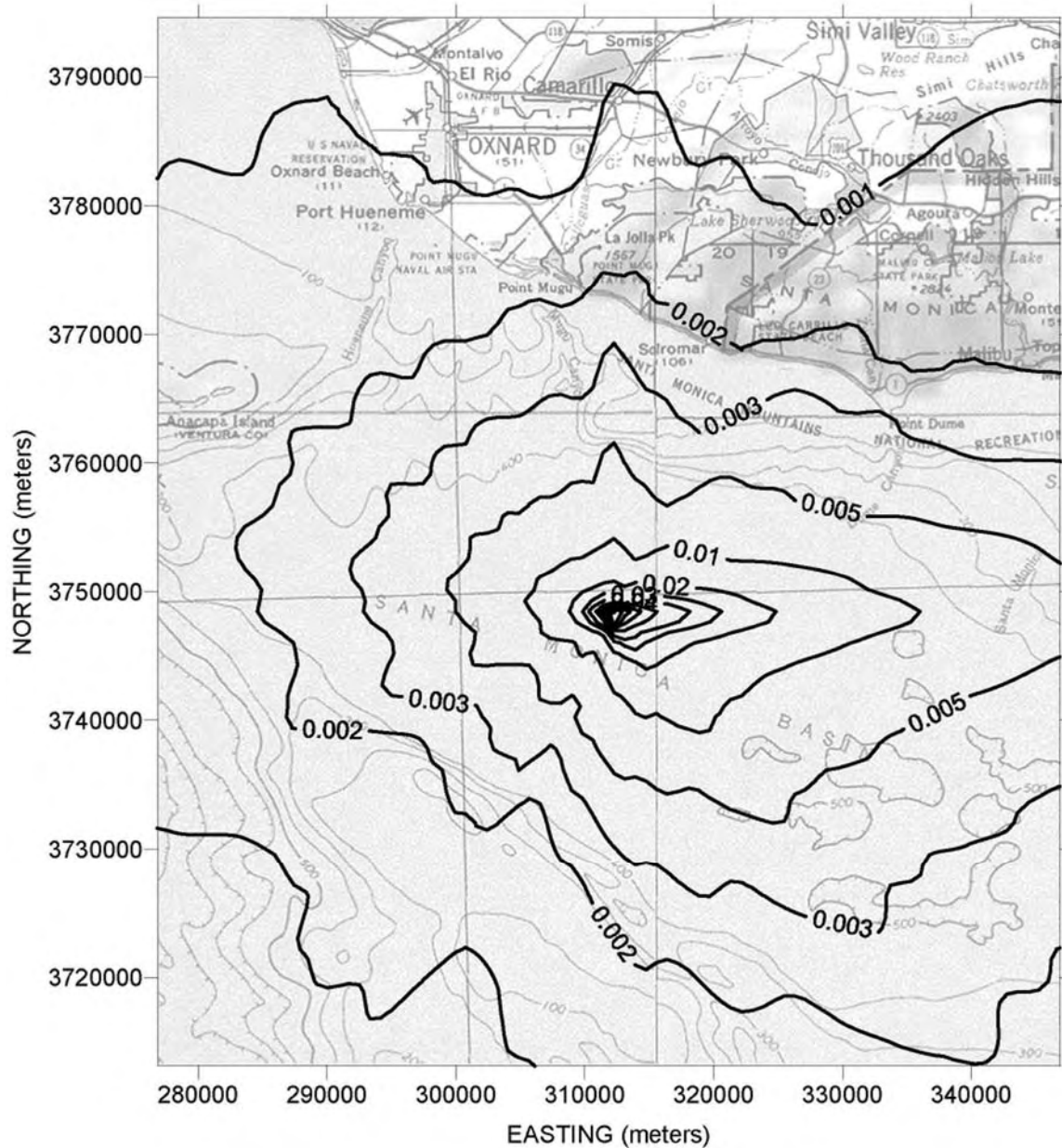


**BHP Cabrillo LNG Deepwater Port**  
**24-Hour Average PM<sub>10</sub> Impacts: FSRU Sources and Marine Vessels**  
**Maximum Modeled Impacts**

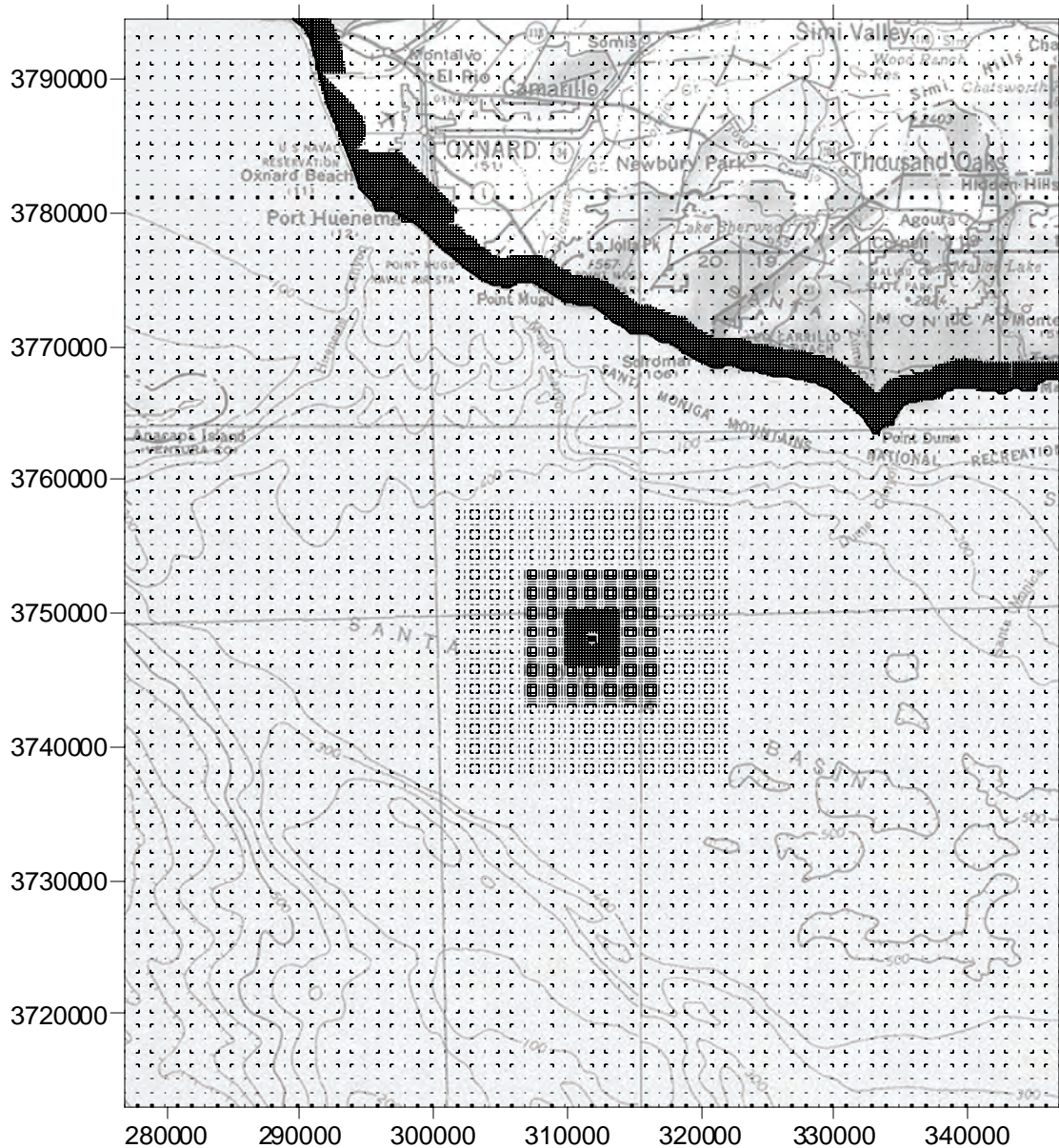


Note: Lines show contours of constant concentration; impacts are in units of  $\mu\text{g}/\text{m}^3$ .

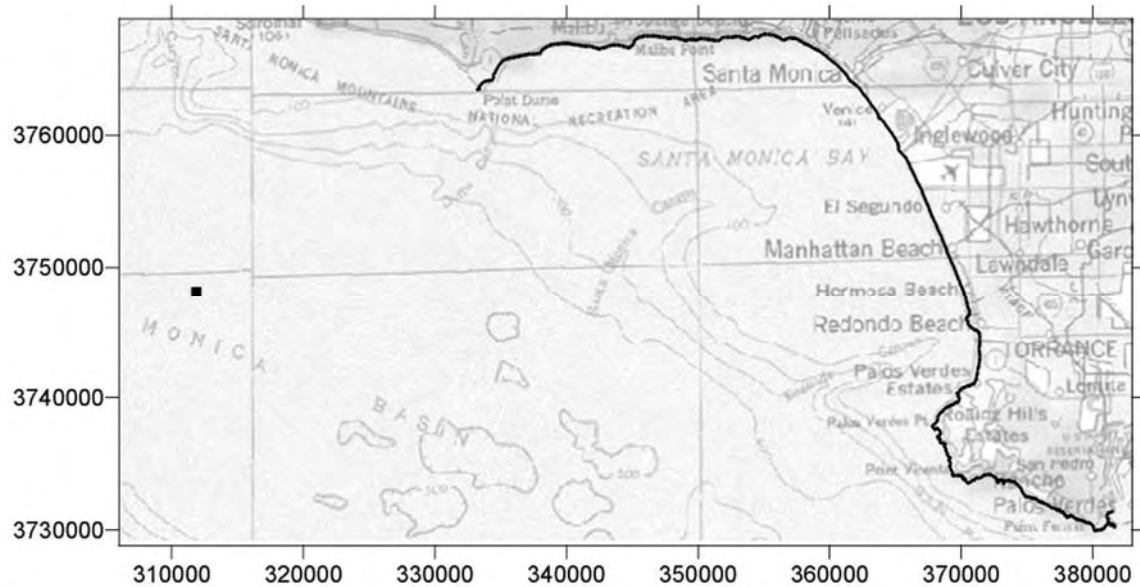
**Figure 4**  
**BHP Cabrillo LNG Deepwater Port**  
**Annual Average PM<sub>10</sub> Impacts: FSRU Sources and Marine Vessels**  
**Maximum Modeled Impacts**



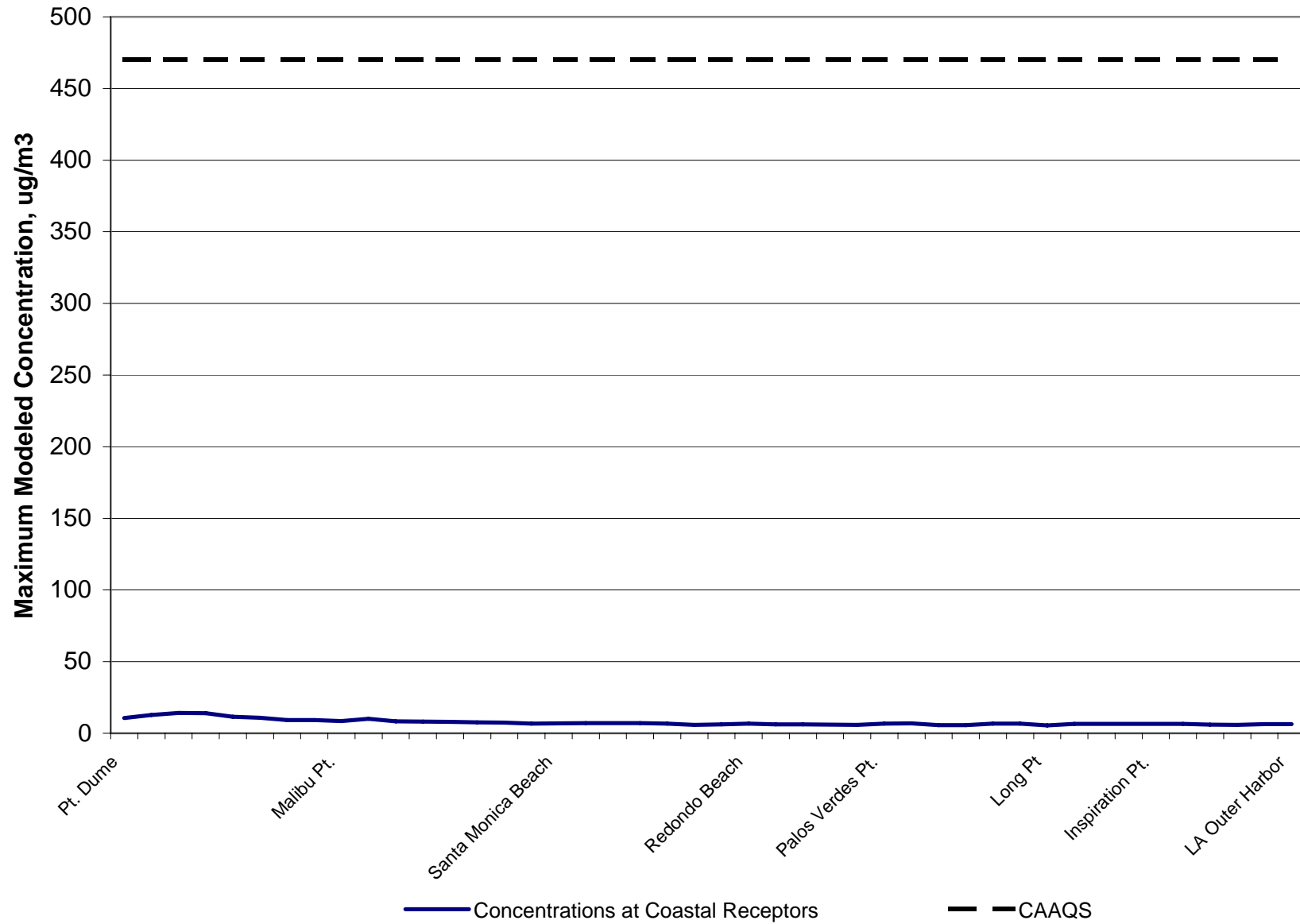
Note: Lines show contours of constant concentration; impacts are in units of  $\mu\text{g}/\text{m}^3$ .



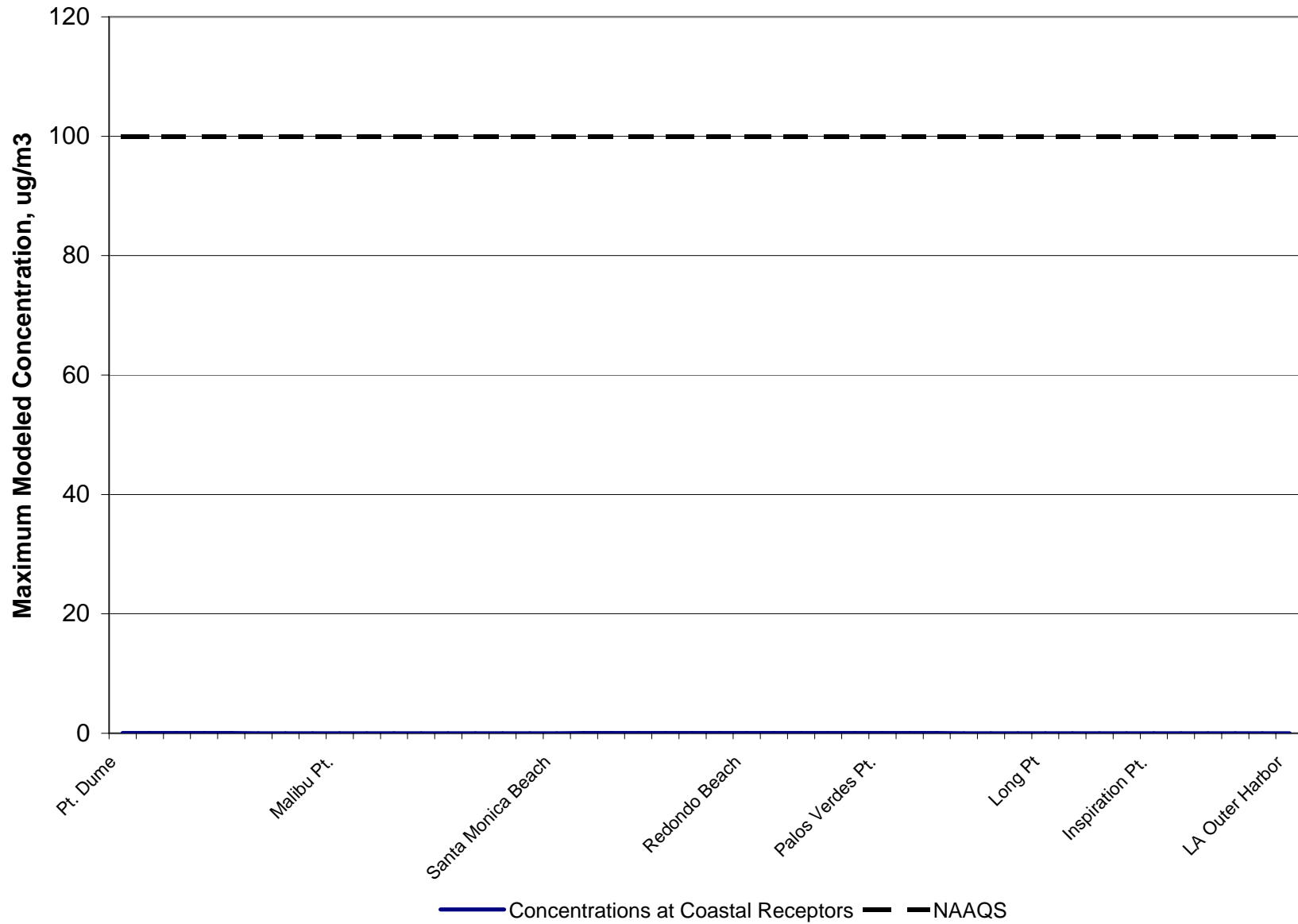
**Figure 1-6**  
**BHP Cabrillo LNG Deepwater Port**  
**Locations of Receptors Used to Evaluate Project Impacts in the**  
**South Coast Air Basin**



**Figure 1-7**  
**BHP Cabrillo LNG Deepwater Port**  
**One-Hour Average NO<sub>2</sub> Impacts: FSRU Sources and Marine Vessels**  
**Maximum Modeled Impacts**



**Figure 1-8**  
**BHP Cabrillo LNG Deepwater Port**  
**Annual Average NO<sub>2</sub> Impacts: FSRU Sources and Marine Vessels**  
**Maximum Modeled Impacts**



**Figure 1-9**  
**BHP Cabrillo LNG Deepwater Port**  
**24-Hour Average PM10/PM2.5 Impacts: FSRU Sources and Marine Vessels**  
**Maximum Modeled Impacts**

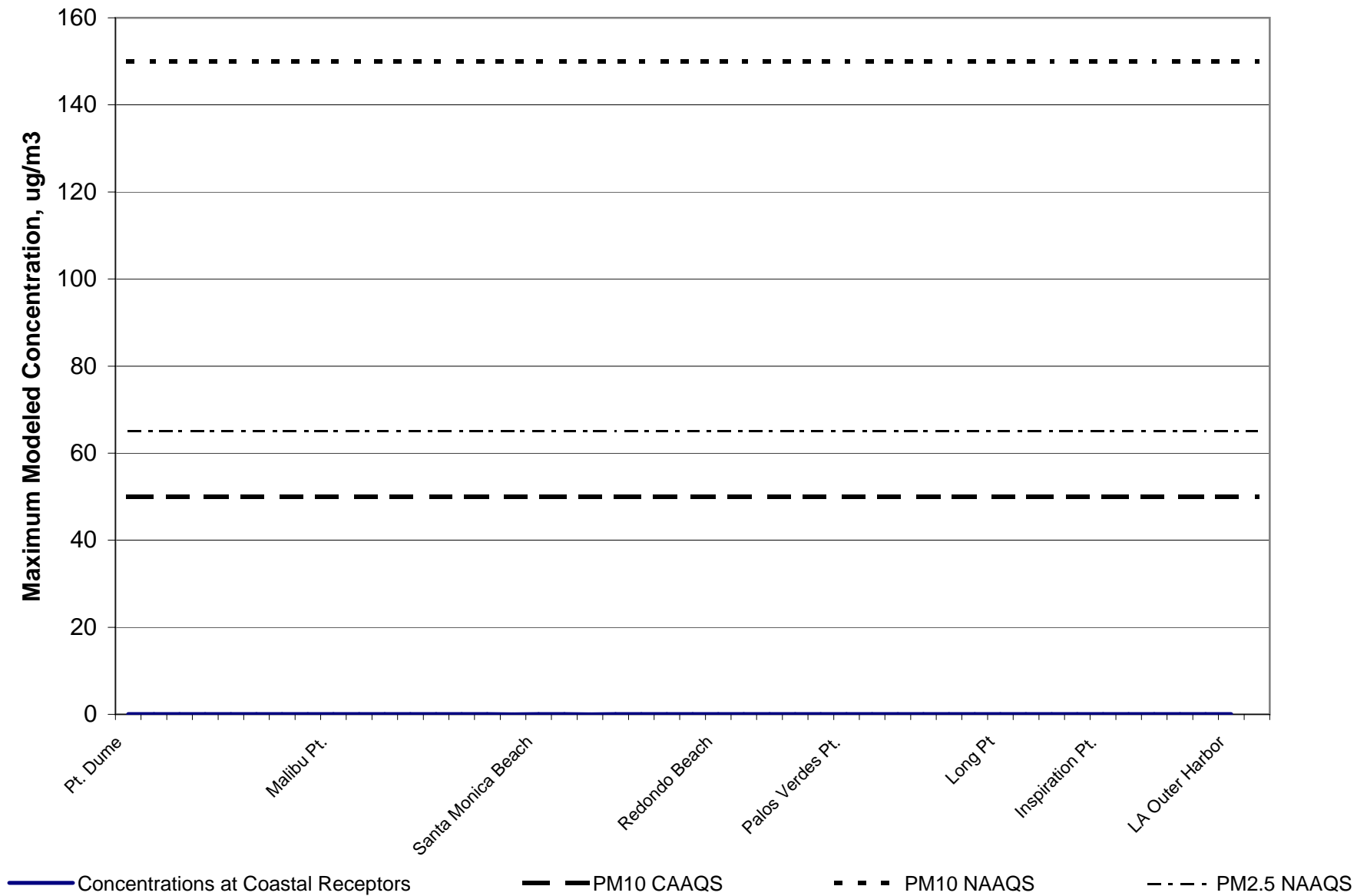
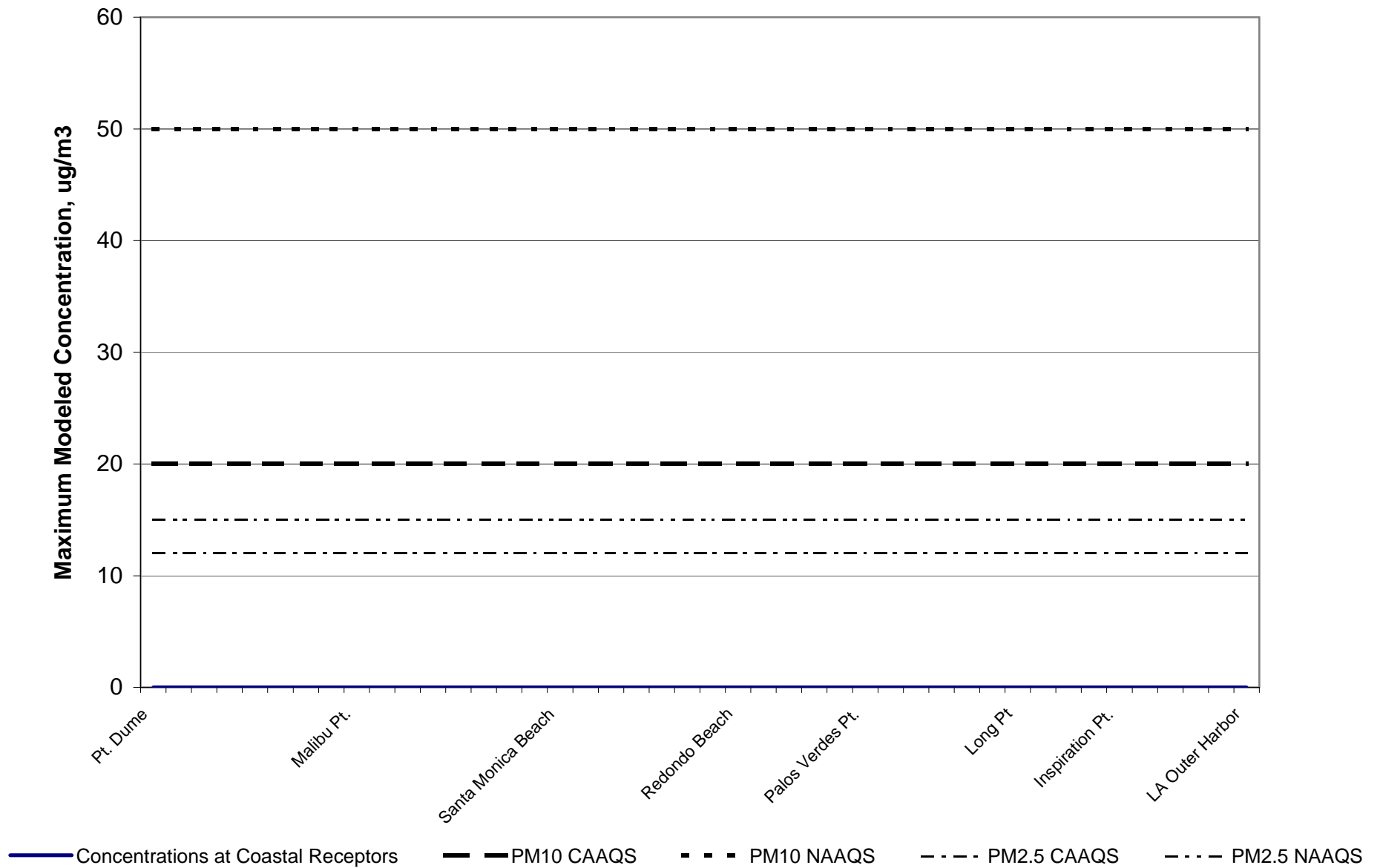




Figure 1-10  
BHP Cabrillo LNG Deepwater Port  
Annual Average PM10/PM2.5 Impacts: FSRU Sources and Marine Vessels  
Maximum Modeled Impacts





### Release Parameters for FSRU Sources

Release Parameter	Units	Main Gens	Backup Gen	Vaporizers: Annual	Vaporizers: Max Hour	Vaporizers: Max Daily
Fuel	Type	Dual Fuel	Diesel	Gas	Gas	Gas
Heat Input	mmBTU/hr	65.7	66.3	115.0	107.8	115.0
Wet Fd Factor	wscf/mmBTU	10,608	10,320	10,610	10,610	10,610
Oxygen Content	percent	15%	15%	3%	3%	3%
Exhaust Temperature	Deg F	800	800	70	70	70
Stack Diameter (each)	inches	39.37	39.37	39.37	39.37	39.37
Number of Active Stacks	each	3	1	4	8	6
Stack Area (each)	sq. ft.	8.45	8.45	8.45	8.45	8.45
Stack Flow (each)	wscf/min	41,145	40,424	23,744	22,260	23,744
Stack Flow (each)	wacf/min	98,186	96,467	23,834	22,344	23,834
Stack Velocity (each)	ft/min	11,614	11,411	2,819	2,643	2,819

Release Height	meters	33	33	35	35	35
Release Diameter (each)	meters	1.00	1.00	1.00	1.00	1.00
Release Velocity (each)	meters/sec	59.0	58.0	14.3	13.4	14.3
Release Temperature	degrees K	700	700	294	294	294

### Release Parameters for FSRU Sources

Release Parameter	Units	Emerg. Pump	Emerg. Gen	Life Boat	LNG Carrier Pumps	Startup
Fuel	Type	Diesel	Diesel	Diesel	Dual Fuel	Diesel
Heat Input	mmBTU/hr	5.9	35.8	0.64	31.8	49.76
Wet Fd Factor	wscf/mmBTU	10,320	10,320	10,320	10,608	10,320
Oxygen Content	percent	15%	15%	15%	15%	15%
Exhaust Temperature	Deg F	800	800	800	800	800
Stack Diameter (each)	inches	10	26	3	31.50	39.37
Number of Active Stacks	each	1	1	1	1	2
Stack Area (each)	sq. ft.	0.55	3.69	0.05	5.41	8.45
Stack Flow (each)	wscf/min	3,565	21,835	388	19,947	30,318
Stack Flow (each)	wacf/min	8,507	52,106	926	47,600	72,350
Stack Velocity (each)	ft/min	15,597	14,132	18,871	8,798	8,558

Release Height	meters	25	25	1	44	33
Release Diameter (each)	meters	0.25	0.66	0.08	0.80	1.00
Release Velocity (each)	meters/sec	79.2	71.8	95.9	44.7	43.5
Release Temperature	degrees K	700	700	700	700	700

**Emission Rates and Stack Parameters for Refined Modeling**  
**BHP Cabrillo LNG Deepwater Port: FSRU Sources**

	Stack Diam, m	Stack Height, m	Exh Temp, Deg K	Exhaust Flow, m3/s	Exhaust Velocity, m/s	Emission Rate, g/s			
						NOx	SO2	CO	PM10
Averaging Period: 1 hour									
Main generators (each, 3 units)	1.000	33.000	699.67	46.34	59.000	0.229	1.431E-03	0.390	n/a
Vaporizers (each, 8 units)	1.000	35.000	294.11	10.545	13.427	0.330	2.239E-03	1.004	n/a
Emergency generator	0.660	25.000	699.67	24.591	71.792	6.533	7.019E-03	4.083	n/a
Fire pump	0.254	25.000	699.67	4.015	79.235	0.933	1.146E-03	0.583	n/a
Life boat	0.076	1.000	699.67	0.437	95.864	0.101	1.248E-04	7.778E-02	n/a
LNG Carrier (pumping)	0.800	44.000	699.67	22.465	44.692	2.074	7.258E-04	1.465	n/a
Averaging Period: 3 hours									
Main generators (each, 3 units)	1.000	33.000	699.67	46.34	59.000	n/a	1.431E-03	n/a	n/a
Vaporizers (each, 8 units)	1.000	35.000	294.11	10.545	13.427	n/a	2.239E-03	n/a	n/a
Emergency generator	0.660	25.000	699.67	24.591	71.792	n/a	2.340E-03	n/a	n/a
Fire pump	0.254	25.000	699.67	4.015	79.235	n/a	3.820E-04	n/a	n/a
Life boat	0.076	1.000	699.67	0.437	95.864	n/a	4.159E-05	n/a	n/a
LNG Carrier (pumping)	0.800	44.000	699.67	22.465	44.692	n/a	7.258E-04	n/a	n/a
Averaging Period: 8 hours									
Main generators (each, 3 units)	1.000	33.000	699.67	46.34	59.000	n/a	n/a	0.390	n/a
Vaporizers (each, 8 units)	1.000	35.000	294.11	10.545	13.427	n/a	n/a	0.954	n/a
Emergency generator	0.660	25.000	699.67	24.591	71.792	n/a	n/a	0.510	n/a
Fire pump	0.254	25.000	699.67	4.015	79.235	n/a	n/a	7.292E-02	n/a
Life boat	0.076	1.000	699.67	0.437	95.864	n/a	n/a	9.722E-03	n/a
LNG Carrier (pumping)	0.800	44.000	699.67	22.465	44.692	n/a	n/a	1.465	n/a
Averaging Period: 24 hours									
Main generators (each, 3 units)	1.000	33.000	699.67	46.34	59.000	n/a	1.431E-03	n/a	0.152
Vaporizers (each, 6 units)	1.000	35.000	294.11	11.248	14.322	n/a	2.389E-03	n/a	2.732E-02
Emergency generator	0.660	25.000	699.67	24.591	71.792	n/a	2.924E-04	n/a	9.722E-03
Fire pump	0.254	25.000	699.67	4.015	79.235	n/a	4.775E-05	n/a	1.389E-03
Life boat	0.076	1.000	699.67	0.437	95.864	n/a	5.199E-06	n/a	2.593E-04
LNG Carrier (pumping)	0.800	44.000	699.67	22.465	44.692	n/a	7.258E-04	n/a	9.152E-02
Averaging Period: Annual									
Main generators (each, 3 units)	1.000	33.000	699.67	46.34	59.000	0.117	7.318E-04	n/a	7.760E-02
Backup generator	1.000	33.000	699.67	45.527	57.967	5.563E-02	1.483E-04	n/a	4.029E-03
Vaporizers (each, 4 units)	1.000	35.000	294.11	11.248	14.322	0.352	2.389E-03	n/a	2.732E-02
Emergency generator	0.660	25.000	699.67	24.591	71.792	7.458E-02	8.012E-05	n/a	2.664E-03
Fire pump	0.254	25.000	699.67	4.015	79.235	1.065E-02	1.308E-05	n/a	3.805E-04
Life boat	0.076	1.000	699.67	0.437	95.864	5.771E-04	7.122E-07	n/a	3.552E-05
LNG Carrier (pumping)	0.800	44.000	699.67	22.465	44.692	2.695E-01	9.433E-05	n/a	1.189E-02

Stack Diam, ft	Stack Height, ft	Exh Temp, Deg F	Exh Flow Rate, ft3/m	Exhaust Velocity, ft/s	Emission Rate, lb/hr			
					NOx	SO2	CO	PM10
3.3	108.3	800	98,186	193.6	1.82	0.01	3.09	n/a
3.28	114.8	70	22,344	44.1	2.62	0.02	7.97	n/a
2.17	82.0	800	52,106	235.5	51.85	0.06	32.41	n/a
0.83	82.0	800	8,507	260.0	7.41	0.01	4.63	n/a
0.3	3.3	800	926	314.5	0.80	0.00	0.62	n/a
2.6	144.4	800	47,600	146.6	16.46	0.01	11.63	n/a
3.3	108.3	800	98,186	193.6	n/a	0.01	n/a	n/a
3.28	114.8	70	22,344	44.1	n/a	0.02	n/a	n/a
2.17	82.0	800	52,106	235.5	n/a	0.02	n/a	n/a
0.83	82.0	800	8,507	260.0	n/a	0.00	n/a	n/a
0.25	3.3	800	926	314.5	n/a	0.00	n/a	n/a
2.62	144.4	800	47,600	146.6	n/a	0.01	n/a	n/a
3.3	108.3	800	98,186	193.6	n/a	n/a	3.09	n/a
3.28	114.8	70	22,344	44.1	n/a	n/a	7.57	n/a
2.17	82.0	800	52,106	235.5	n/a	n/a	4.05	n/a
0.83	82.0	800	8,507	260.0	n/a	n/a	0.58	n/a
0.25	3.3	800	926	314.5	n/a	n/a	0.08	n/a
2.62	144.4	800	47,600	146.6	n/a	n/a	11.63	n/a
3.28	108.3	800	98,186	193.6	n/a	0.01	n/a	1.20
3.28	114.8	70	23,834	47.0	n/a	0.02	n/a	0.22
2.17	82.0	800	52,106	235.5	n/a	2.32E-03	n/a	0.08
0.83	82.0	800	8,507	260.0	n/a	3.79E-04	n/a	0.01
0.25	3.3	800	926	314.5	n/a	4.13E-05	n/a	0.00
2.62	144.4	800	47,600	146.6	n/a	5.76E-03	n/a	0.73
3.28	108.3	800	98,186	193.6	0.93	0.01	n/a	0.62
3.28	108.3	800	96,467	190.2	0.44	0.00	n/a	0.03
3.28	114.8	70	23,834	47.0	2.79	0.02	n/a	0.22
2.17	82.0	800	52,106	235.5	0.59	6.36E-04	n/a	0.02
0.83	82.0	800	8,507	260.0	0.08	1.04E-04	n/a	3.02E-03
0.25	3.3	800	926	314.5	0.0046	5.65E-06	n/a	2.82E-04
2.62	144.4	800	47,600	146.6	2.1391	7.49E-04	n/a	0.09

### Maximum Hourly Emissions from Tug Main Generators

SIC	1321		
PROCESS EQPT DESCRIPTION	Tug Supply Main Generator Set Engines, 15,000 BHP, 2 vessels alternating port calls		
FUEL TYPE/PROCESS INFO	CA Diesel, 15 ppm S		
TOTAL YEARLY PROCESS RATE	21242	MW-hrs	
HOURLY PROCESS RATE	11.19	MW	
PROCESS UNITS	PT071	MW-hrs	
HIGHER HEATING VALUE	1007.6	BTU/cu ft	
COMBINED ENGINE RATING	15000	BHP	from BHP estimates
LOAD FACTOR	100%	percent	from activity profile
OPERATING SCHEDULE	17264	hrs/yr	from activity profile
HEAT RATE	9751	BTU/KW-hr	
CONVERSION EFFICIENCY	35.0%	percent	
HEAT INPUT	109.08	mmBTU/hr	
DRY Fd	9190	dscf/mmBTU	USEPA Method 19
EXHAUST FLOW	3.55	mmdscf/hr	

EMITTENT NAME	EMITTENT PPMV	CTL EF LBS/UNIT	2 vessels based on 100% load		RATE g/kw-hr	RATE g/bhp-hr	
			MAXIMUM LBS/HR				
Nitrogen Oxides (as NO <sub>2</sub> )	65	2.4692	55.24		1.120	0.835	
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	80	1.0582	23.67		0.480	0.358	
Carbon Monoxide (CO)	100	2.3149	51.79		1.050	0.783	
Sulfur Dioxide (SO <sub>2</sub> )	0.29	0.0152	0.34		0.007	0.005	
Particulates (as PM <sub>10</sub> ) (grains/dscf)	0.0029	0.1323	2.96		0.060	0.045	
Carbon Dioxide (CO <sub>2</sub> )	4.44%	1608.9857	35995.21		730	544	

### Maximum Hourly Emissions from Tug Auxiliary Generators

SIC	1321		
PROCESS EQPT DESCRIPTION	Tug Supply Auxiliary Generator, 150 BHP, 2 vessels alternating port calls		
FUEL TYPE/PROCESS INFO	CA Diesel, 15 ppm S		
TOTAL YEARLY PROCESS RATE	966	MW-hrs	
HOURLY PROCESS RATE	0.11	MW	
PROCESS UNITS	PT071	MW-hrs	
HIGHER HEATING VALUE	1007.6	BTU/cu ft	
COMBINED ENGINE RATING	150	BHP	from BHP estimates
LOAD FACTOR	100%	percent	from activity profile
OPERATING SCHEDULE	17264	hrs/yr	from activity profile
HEAT RATE	9751	BTU/KW-hr	
CONVERSION EFFICIENCY	35.0%	percent	
HEAT INPUT	1.09	mmBTU/hr	
DRY Fd	9190	dscf/mmBTU	USEPA Method 19
EXHAUST FLOW	0.04	mmdscf/hr	

EMITTENT NAME	EMITTENT PPMV	CTL EF LBS/UNIT			2 vessels MAXIMUM LBS/HR	RATE g/kw-hr	RATE g/bhp-hr
Nitrogen Oxides (as NO <sub>2</sub> )	41	1.5432			0.173	0.700	0.522
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	50	0.6614			0.074	0.300	0.224
Carbon Monoxide (CO)	143	3.3070			0.370	1.500	1.119
Sulfur Dioxide (SO <sub>2</sub> )	0.29	0.0152			0.002	0.007	0.005
Particulates (as PM <sub>10</sub> ) (grains/dscf)	0.0044	0.1984			0.022	0.090	0.067
Carbon Dioxide (CO <sub>2</sub> )	4.44%	1608.9857			179.976	730	544

### Maximum Hourly Emissions from Crew Boat Main Engines

SIC	1321		
PROCESS EQPT DESCRIPTION	Crew Boat Main Engines, 1500 BHP		
FUEL TYPE/PROCESS INFO	CA Diesel, 15 ppm S		
TOTAL YEARLY PROCESS RATE	1609	MW-hrs	
HOURLY PROCESS RATE	1.12	MW	
PROCESS UNITS	PT071	MW-hrs	
HIGHER HEATING VALUE	1007.6	BTU/cu ft	
COMBINED ENGINE RATING	1500	BHP	from BHP estimates
LOAD FACTOR	100%	percent	from activity profile
OPERATING SCHEDULE	1438	hrs/yr	from activity profile
HEAT RATE	9751	BTU/KW-hr	
CONVERSION EFFICIENCY	35.0%	percent	
HEAT INPUT	10.91	mmBTU/hr	
DRY Fd	9190	dscf/mmBTU	USEPA Method 19
EXHAUST FLOW	0.36	mmdscf/hr	

EMITTENT NAME	EMITTENT PPMV	CTL EF LBS/UNIT			100% LOAD MAXIMUM LBS/HR	RATE* g/kw-hr	RATE g/bhp-hr
Nitrogen Oxides (as NO <sub>2</sub> )	65	2.4692			2.76	1.120	0.835
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	80	1.0582			1.18	0.480	0.358
Carbon Monoxide (CO)	100	2.3149			2.59	1.050	0.783
Sulfur Dioxide (SO <sub>2</sub> )	0.29	0.0152			0.02	0.007	0.005
Particulates (as PM <sub>10</sub> ) (grains/dscf)	0.0029	0.1323			0.15	0.060	0.045
Carbon Dioxide (CO <sub>2</sub> )	4.44%	1608.9857			1,800	730	544

### Maximum Hourly Emissions from Crew Boat Auxiliary Generator

SIC	1321		
PROCESS EQPT DESCRIPTION	Crew Boat Generator Engine, 150 BHP		
FUEL TYPE/PROCESS INFO	CA Diesel, 15 ppm S		
TOTAL YEARLY PROCESS RATE	161	MW-hrs	
HOURLY PROCESS RATE	0.11	MW	
PROCESS UNITS	PT071	MW-hrs	
HIGHER HEATING VALUE	1007.6	BTU/cu ft	
COMBINED ENGINE RATING	150	BHP	from BHP estimates
LOAD FACTOR	100%	percent	from activity profile
OPERATING SCHEDULE	1438	hrs/yr	from activity profile
HEAT RATE	9751	BTU/KW-hr	
CONVERSION EFFICIENCY	35.0%	percent	
HEAT INPUT	1.09	mmBTU/hr	
DRY Fd	9190	dscf/mmBTU	USEPA Method 19
EXHAUST FLOW	0.036	mmdscf/hr	

EMITTENT NAME	EMITTENT PPMV	CTL EF LBS/UNIT			100% LOAD MAXIMUM LBS/HR	RATE* g/kw-hr	RATE g/bhp-hr
Nitrogen Oxides (as NO <sub>2</sub> )	41	1.5432			0.17	0.700	0.522
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	50	0.6614			0.07	0.300	0.224
Carbon Monoxide (CO)	143	3.3070			0.37	1.500	1.119
Sulfur Dioxide (SO <sub>2</sub> )	0.29	0.0152			0.00	0.007	0.005
Particulates (as PM <sub>10</sub> ) (grains/dscf)	0.0044	0.1984			0.02	0.090	0.067
Carbon Dioxide (CO <sub>2</sub> )	4.44%	1608.9857			180	730	544

### Maximum Hourly Emissions from Small LNG Carrier

SIC	1321		LNG Carrier, 33,000 KW Total
PROCESS EQPT DESCRIPTION			Scarborough LNG, 99.7% methane, 1 ppmv S & 15 ppmw S California diesel pilot charge
FUEL TYPE/PROCESS INFO			
TOTAL YEARLY PROCESS RATE	68277	MW-hrs	
HOURLY PROCESS RATE	33.00	MW	
PROCESS UNITS	PT071	MW-hrs	
HIGHER HEATING VALUE	1007.6	BTU/cu ft	Scarborough LNG
COMBINED ENGINE RATING	33000	KW	from activity profile
LOAD FACTOR	100%	percent	from activity profile
OPERATING SCHEDULE	2069	hrs/yr	from activity profile
HEAT RATE	8533	BTU/KW-hr	
CONVERSION EFFICIENCY	40.0%	percent	
HEAT INPUT	281.57	mmBTU/hr	
DRY Fd	8714	dscf/mmBTU	USEPA Method 19
EXHAUST FLOW	8.69	mmdscf/hr	

EMITTENT NAME	EMITTENT PPMV	CTL EF LBS/UNIT			ACTUAL LBS/HR	RATE g/kw-hr	RATE g/bhp-hr
Nitrogen Oxides (as NO <sub>2</sub> )	140	4.4093			145.51	2.000	1.491
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	116	1.2669			41.81	0.575	0.429
Carbon Monoxide (CO)	163	3.1159			102.82	1.413	1.054
Sulfur Dioxide (SO <sub>2</sub> )	0.04	0.0015			0.05	0.0007	0.0005
Particulates (as PM <sub>10</sub> ) (grains/dscf)	0.0052	0.1946			6.42	0.0883	0.066
Carbon Dioxide (CO <sub>2</sub> )	4.34%	1305.1434			43,070	592	441



### Maximum Hourly Emissions from Large LNG Carrier

SIC	1321		
PROCESS EQPT DESCRIPTION	LNG Carrier, 44,000 KW Total		
FUEL TYPE/PROCESS INFO	Scarborough LNG, 99.7% methane, 1 ppmv S & 15 ppmw S California diesel pilot charge		
TOTAL YEARLY PROCESS RATE	10170	MW-hrs	
HOURLY PROCESS RATE	44.00	MW	
PROCESS UNITS	PT071	MW-hrs	
HIGHER HEATING VALUE	1007.6	BTU/cu ft	Scarborough LNG
COMBINED ENGINE RATING	44000	KW	from activity profile
LOAD FACTOR	100%	percent	from activity profile
OPERATING SCHEDULE	1651	hrs/yr	from activity profile
HEAT RATE	8533	BTU/KW-hr	
CONVERSION EFFICIENCY	40.0%	percent	
HEAT INPUT	52.56	mmBTU/hr	
DRY Fd	8714	dscf/mmBTU	USEPA Method 19
EXHAUST FLOW	1.62	mmdscf/hr	

EMITTENT NAME	EMITTENT PPMV	CTL EF LBS/UNIT			100% load MAXIMUM LBS/HR	RATE g/kw-hr	RATE g/bhp-hr
Nitrogen Oxides (as NO <sub>2</sub> )	1002	4.4093			194.01	2.000	1.491
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	827	1.2669			55.74	0.575	0.429
Carbon Monoxide (CO)	1163	3.1159			137.10	1.413	1.054
Sulfur Dioxide (SO <sub>2</sub> )	0.25	0.0015			0.07	0.0007	0.0005
Particulates (as PM <sub>10</sub> ) (grains/dscf)	0.0369	0.1946			8.56	0.0883	0.066
Carbon Dioxide (CO <sub>2</sub> )	31.00%	1305.1434			57,426	592	441

## Vessel Emissions and Activity in District Waters

Pollutant	Period	Source	
		Tug Supply	Crew Boat
NOx	lb/hr	16.7	1.2
	lb/day	16.7	1.3
	tons/yr	0.22	0.06
SOx	lb/hr	1.0E-01	7.8E-03
	lb/day	1.0E-01	8.2E-03
	tons/yr	1.345E-03	4.056E-04
CO	lb/hr	15.721	1.247
	lb/day	15.721	1.3
	tons/yr	0.21	0.06
PM10	lb/hr	0.9	0.1
	lb/day	0.9	0.1
	tons/yr	1.18E-02	3.73E-03

### Vessel Notes:

Tug Supply boats making 52 round trips to FSRU per year, time & load weighted engine operation

Crew boat making 198 round trips to FSRU per year, time & load weighted engine operation

Operating component in state waters only (inside 3-mile limit)

Each vessel makes 1 RT on 1 day.

Each vessel transits District waters in 1/2 hr.

Tug supply vessel travels from FSRU to dock and return: 1 hr in DW in 8-hr prd.

Crew boat travels from dock to FSRU and return: 1 hr in DW in 8-hr prd.

## Vessel Emissions and Activity in Federal Waters

	NOx	SOx	CO	PM10
<b>Vessel Activity between District Water Boundary and FSRU (FW1)</b>				
Assist Tugs (51% engine load on mains; 50% on gens)				
Hours/yr	104			
Emissions, lb/hr	28.26	0.174	26.60	1.520
Emissions, tpy	1.47	0.009	1.38	0.08
Crew Boat (90% engine load on mains; 50% on gens)				
Hours/yr	396			
Emissions, lb/hr	2.57	0.016	2.52	0.144
Emissions, tpy	0.509	0.003	0.498	0.03
<b>Vessel Activity at FSRU (FW2)</b>				
LNG Carrier (4.42% engine load)				
Hours/yr	1614 (small carrier)			
Emissions, lb/hr	8.58	3.00E-03	6.06	0.378
Emissions, tpy	5.2	0.002	3.7	0.2
Assist Tugs (10% engine load on mains; 50% on gens)				
Hours/yr	8419			
Emissions, lb/hr	5.61	0.035	5.36	0.31
Emissions, tpy	23.6	0.1	22.6	1.3
Crew Boat (19% engine load on mains; 50% on gens)				
Hours/yr	990			
Emissions, lb/hr	0.61	0.004069	0.68	0.03921
Emissions, tpy	0.302	0.002	0.34	0.02
<b>Vessel Activity Between FSRU and Federal Waters Boundary (FW3)</b>				
LNG Carrier (48% engine load)				
Hours/yr	455 (small carrier)			
Emissions, lb/hr	93.12	0.03	65.81	4.11
Emissions, tpy	15.9	0.01	11.2	0.7
Assist Tugs (45% engine load on mains; 50% on gens)				
Hours/yr	163			
Emissions, lb/hr	24.94	0.15	23.49	1.34
Emissions, tpy	2.0	0.0	1.9	0.1
Total Emissions in Federal Waters				
Assist Tugs	27.1	0.17	25.9	1.5
Crew Boat	0.8	0.01	0.8	0.0
LNG Carrier	21.1	0.01	14.9	0.9
Total	49.0	0.18	41.6	2.5

# Stack Parameters for BHP Cabrillo Support Vessels

Release Parameter	Units	Tug Supply	Crew Boat	Large LNG Carrier	Small LNG Carrier
Fuel	Type	Diesel	Diesel	Dual Fuel	Dual Fuel
Total Engine Rating	BHP	15000	1500	59004	44253
Average Load	percent	30%	47%	14%	14%
Heat Input	mmBTU/hr	32.7	5.1	52.56	39.42
Wet Fd Factor	wscf/mmBTU	10,320	10,320	10,608	10608
Oxygen Content	percent	15%	15%	15%	15%
Exhaust Temperature	Deg F	800	800	800	800
Effective Stack Diameter	inches	30.6	13.0	31.5	31.5
Stack Height	feet	29.5	16.4	144.4	144.4
Stack Area	sq. ft.	5.11	0.92	5.41	5.41
Stack Flow	wscf/min	19,938	3,124	32,919	24,688
Stack Flow	wacf/min	47,579	7,454	78,556	58,916
Stack Velocity	ft/min	9,316	8,087	14,516	10,890
	ft/sec	155	135	241.9	181.5
	mph	105.87	91.89	164.9	123.8
Release Height	meters	9.000	5.000	44	44
Eff Release Diameter	meters	0.78	0.33	0.80	0.80
Release Velocity	meters/sec	47.3	41.1	73.7	55.3
Release Temperature	degrees K	700	700	700	700

Total Engine Rating is total rating of all vessel engines.

Effective stack diameter is equivalent diameter of 4 tug supply stacks.

Heat input is average hourly heat input based on average load on main engine(s) while operating in District waters.

**Stack Parameters for Vessel Activity**

	Stack Diam, m	Stack Height, m	Exh Temp, Deg K	Exhaust Flow, m3/s	Exhaust Velocity, m/s	Emission Rate, g/s			
						NOx	SO2	CO	PM10
Averaging Period: 1 hour									
Assist Tugs DW	0.777	9.000	699.67	22.45	47.327	n/a	n/a	n/a	n/a
Crew Boat DW	0.330	5.000	699.67	3.52	41.081	7.678E-02	4.914E-04	7.853E-02	n/a
Assist Tugs FW1	0.777	9.000	699.67	22.45	47.327	n/a	n/a	n/a	n/a
Crew Boat FW1	0.330	5.000	699.67	3.52	41.081	0.162	1.015E-03	0.158	n/a
Assist Tugs FW2	0.777	9.000	699.67	22.45	47.327	0.707	4.379E-03	0.676	n/a
LNG Carrier FW2	0.800	44.000	699.67	37.07	73.739	1.080	3.782E-04	0.764	n/a
Crew Boat FW2	0.330	5.000	699.67	3.52	41.081	n/a	n/a	n/a	n/a
Assist Tugs FW3	0.777	9.000	699.67	22.45	47.327	n/a	n/a	n/a	n/a
LNG Carrier FW3	0.800	44.000	699.67	37.07	73.739	n/a	n/a	n/a	n/a
Averaging Period: 3 hours									
Assist Tugs DW	0.777	9.000	699.67	22.45	47.327	n/a	n/a	n/a	n/a
Crew Boat DW	0.330	5.000	699.67	3.52	41.081	n/a	3.276E-04	n/a	n/a
Assist Tugs FW1	0.777	9.000	699.67	22.45	47.327	n/a	n/a	n/a	n/a
Crew Boat FW1	0.330	5.000	699.67	3.52	41.081	n/a	6.765E-04	n/a	n/a
Assist Tugs FW2	0.777	9.000	699.67	22.45	47.327	n/a	4.379E-03	n/a	n/a
LNG Carrier FW2	0.800	44.000	699.67	37.07	73.739	n/a	3.782E-04	n/a	n/a
Crew Boat FW2	0.330	5.000	699.67	3.52	41.081	n/a	1.709E-04	n/a	n/a
Assist Tugs FW3	0.777	9.000	699.67	22.45	47.327	n/a	n/a	n/a	n/a
LNG Carrier FW3	0.800	44.000	699.67	37.07	73.739	n/a	n/a	n/a	n/a
Averaging Period: 8 hours									
Assist Tugs DW	0.777	9.000	699.67	22.45	47.327	n/a	n/a	n/a	n/a
Crew Boat DW	0.330	5.000	699.67	3.52	41.081	n/a	n/a	2.062E-02	n/a
Assist Tugs FW1	0.777	9.000	699.67	22.45	47.327	n/a	n/a	n/a	n/a
Crew Boat FW1	0.330	5.000	699.67	3.52	41.081	n/a	n/a	7.923E-02	n/a
Assist Tugs FW2	0.777	9.000	699.67	22.45	47.327	n/a	n/a	0.676	n/a
LNG Carrier FW2	0.800	44.000	699.67	37.07	73.739	n/a	n/a	0.764	n/a
Crew Boat FW2	0.330	5.000	699.67	3.52	41.081	n/a	n/a	5.331E-02	n/a
Assist Tugs FW3	0.777	9.000	699.67	22.45	47.327	n/a	n/a	n/a	n/a
LNG Carrier FW3	0.800	44.000	699.67	37.07	73.739	n/a	n/a	n/a	n/a
Averaging Period: 24 hours									
Assist Tugs DW	0.777	9.000	699.67	22.45	47.327	n/a	n/a	n/a	n/a
Crew Boat DW	0.330	5.000	699.67	3.52	41.081	n/a	4.299E-05	n/a	3.956E-04
Assist Tugs FW1	0.777	9.000	699.67	22.45	47.327	n/a	n/a	n/a	n/a
Crew Boat FW1	0.330	5.000	699.67	3.52	41.081	n/a	1.691E-04	n/a	1.515E-03
Assist Tugs FW2	0.777	9.000	699.67	22.45	47.327	n/a	4.379E-03	n/a	3.868E-02
LNG Carrier FW2	0.800	44.000	699.67	37.07	73.739	n/a	3.782E-04	n/a	4.768E-02
Crew Boat FW2	0.330	5.000	699.67	3.52	41.081	n/a	1.068E-04	n/a	1.029E-03
Assist Tugs FW3	0.777	9.000	699.67	22.45	47.327	n/a	n/a	n/a	n/a
LNG Carrier FW3	0.800	44.000	699.67	37.07	73.739	n/a	n/a	n/a	n/a
Averaging Period: Annual									
Assist Tugs DW	0.777	9.000	699.67	22.45	47.327	6.262E-03	3.868E-05	n/a	3.403E-04
Crew Boat DW	0.330	5.000	699.67	3.52	41.081	1.823E-03	1.167E-05	n/a	1.073E-04
Assist Tugs FW1	0.777	9.000	699.67	22.45	47.327	4.227E-02	2.600E-04	n/a	2.274E-03
Crew Boat FW1	0.330	5.000	699.67	3.52	41.081	1.465E-02	9.174E-05	n/a	8.217E-04
Assist Tugs FW2	0.777	9.000	699.67	22.45	47.327	0.679	4.209E-03	n/a	3.718E-02
LNG Carrier FW2	0.800	44.000	699.67	27.81	55.303	0.149	5.226E-05	n/a	6.589E-03
Crew Boat FW2	0.330	5.000	699.67	3.52	41.081	8.702E-03	5.794E-05	n/a	5.583E-04
Assist Tugs FW3	0.777	9.000	699.67	22.45	47.327	5.858E-02	3.604E-04	n/a	3.154E-03
LNG Carrier FW3	0.800	44.000	699.67	27.81	55.303	0.457	1.600E-04	n/a	2.017E-02

LNG Carrier stack height includes hull height, which is 21 meters above water line.

FW1 represents activity between District Water Boundary and FSRU

FW2 represents activity within safety zone and at FSRU

FW3 represents activity between Safety Zone and Federal Waters Boundary

**Stack Parameters for Vessel Activity**

	Effective Stack Diam, ft	Stack Height, ft	Exh Temp, Deg F	Exh Flow Rate, ft3/m	Exhaust Velocity, ft/s	Emission Rate, lb/hr			
						NOx	SO2	CO	PM10
Averaging Period: 1 hr									
Assist Tugs DW	2.55	29.5	800	47,579	155.3	n/a	n/a	n/a	n/a
Crew Boat DW	1.08	16.4	800	7,454	134.8	0.61	3.9E-03	0.62	n/a
Assist Tugs FW1	2.55	29.5	800	47,579	155.3	n/a	n/a	n/a	n/a
Crew Boat FW1	1.08	16.4	800	7,454	134.8	1.286	8.1E-03	1.2577	n/a
Assist Tugs FW2	2.55	29.5	800	47,579	155.3	5.61	3.5E-02	5.36	n/a
LNG Carrier FW2	2.63	144.4	800	78,556	241.9	8.58	3.0E-03	6.06	n/a
Crew Boat FW2	1.08	16.4	800	7,454	134.8	n/a	n/a	n/a	n/a
Assist Tugs FW3	2.55	29.5	800	47,579	155.3	n/a	n/a	n/a	n/a
LNG Carrier FW3	2.63	144.4	800	78,556	241.9	n/a	n/a	n/a	n/a
Averaging Period: 3 ho									
Assist Tugs DW	2.55	29.5	800	47,579	155.3	n/a	n/a	n/a	n/a
Crew Boat DW	1.08	16.4	800	7,454	134.8	n/a	2.6E-03	n/a	n/a
Assist Tugs FW1	2.55	29.5	800	47,579	155.3	n/a	n/a	n/a	n/a
Crew Boat FW1	1.08	16.4	800	7,454	134.8	n/a	5.4E-03	n/a	n/a
Assist Tugs FW2	2.55	29.5	800	47,579	155.3	n/a	3.5E-02	n/a	n/a
LNG Carrier FW2	2.63	144.4	800	78,556	241.9	n/a	3.0E-03	n/a	n/a
Crew Boat FW2	1.08	16.4	800	7,454	134.8	n/a	1.4E-03	n/a	n/a
Assist Tugs FW3	2.55	29.5	800	47,579	155.3	n/a	n/a	n/a	n/a
LNG Carrier FW3	2.63	144.4	800	78,556	241.9	n/a	n/a	n/a	n/a
Averaging Period: 8 hr									
Assist Tugs DW	2.55	29.5	800	47,579	155.3	n/a	n/a	n/a	n/a
Crew Boat DW	1.08	16.4	800	7,454	134.8	n/a	n/a	0.16	n/a
Assist Tugs FW1	2.55	29.5	800	47,579	155.3	n/a	n/a	n/a	n/a
Crew Boat FW1	1.08	16.4	800	7,454	134.8	n/a	n/a	0.63	n/a
Assist Tugs FW2	2.55	29.5	800	47,579	155.3	n/a	n/a	5.36	n/a
LNG Carrier FW2	2.63	144.4	800	78,556	241.9	n/a	n/a	6.06	n/a
Crew Boat FW2	1.08	16.4	800	7,454	134.8	n/a	n/a	0.42	n/a
Assist Tugs FW3	2.55	29.5	800	47,579	155.3	n/a	n/a	n/a	n/a
LNG Carrier FW3	2.63	144.4	800	78,556	241.9	n/a	n/a	n/a	n/a
Averaging Period: 24 hr									
Assist Tugs DW	2.55	29.5	800	47,579	155.3	n/a	n/a	n/a	n/a
Crew Boat DW	1.08	16.4	800	7,454	134.8	n/a	3.4E-04	n/a	3.1E-03
Assist Tugs FW1	2.55	29.5	800	47,579	155.3	n/a	n/a	n/a	n/a
Crew Boat FW1	1.08	16.4	800	7,454	134.8	n/a	1.3E-03	n/a	0.01
Assist Tugs FW2	2.55	29.5	800	47,579	155.3	n/a	3.5E-02	n/a	0.31
LNG Carrier FW2	2.63	144.4	800	78,556	241.9	n/a	3.0E-03	n/a	0.38
Crew Boat FW2	1.08	16.4	800	7,454	134.8	n/a	8.5E-04	n/a	0.01
Assist Tugs FW3	2.55	29.5	800	47,579	155.3	n/a	0.0E+00	n/a	0.00
LNG Carrier FW3	2.63	144.4	800	78,556	241.9	n/a	0.0E+00	n/a	0.00
Averaging Period: Ann									
Assist Tugs DW	2.55	29.5	800	47,579	155.3	0.05	3.1E-04	n/a	2.7E-03
Crew Boat DW	1.08	16.4	800	7,454	134.8	0.01	9.3E-05	n/a	8.5E-04
Assist Tugs FW1	2.55	29.5	800	47,579	155.3	0.34	2.1E-03	n/a	0.02
Crew Boat FW1	1.08	16.4	800	7,454	134.8	0.12	7.3E-04	n/a	0.01
Assist Tugs FW2	2.55	29.5	800	47,579	155.3	5.39	3.3E-02	n/a	0.30
LNG Carrier FW2	2.63	144.4	800	58,916	181.5	1.18	4.1E-04	n/a	0.05
Crew Boat FW2	1.08	16.4	800	7,454	134.8	0.07	4.6E-04	n/a	0.00
Assist Tugs FW3	2.55	29.5	800	47,579	155.3	0.46	2.9E-03	n/a	0.03
LNG Carrier FW3	2.63	144.4	800	58,916	181.5	3.63	1.3E-03	n/a	0.16

**Time and Location of Maximum Impact by Pollutant and Averaging Period**  
**Project Operation**

Pollutant	Average Period	Max. Modeled Offshore Impact					Max. Modeled Onshore Impact				
		Conc, ug/m3	Time/Date		Location		Conc, ug/m3	Time/Date		Location	
			Hour	Date	Ux	Uy		Hour	Date	Ux	Uy
NOx	1-hour (1)	212.9	12	1/6/2003	311570	3747450	43.7	16	11/19/2002	321200	3747750
	annual	3.6	--	2000	312470	3748150	0.03	--	2000	333230	3763600
SO2	1-hour	0.7	18	7/6/2001	311770	3748650	0.1	16	12/27/2000	313400	3772500
	3-hour	0.6	12	9/18/2001	312370	3747950	0.05	18		313400	3772500
	24-hour	0.1	24	3/15//2001	311370	3748400	<0.01	24	12/27/2000	320800	3769000
	annual	0.02	--	2000	312470	3748150	<0.01	--	2000	332600	3764200
CO	1-hour	313.9	19	10/9/2001	312370	3748050	65.4	15	12/27/2000	321100	3769000
	8-hour	186.0	24	2/7/2002	312370	3748350	7.1	16	12/27/2000	313400	3772500
PM10	24-hour	2.0	24	6/2/2003	311470	3748650	0.2	24	1/16/2003	313000	3772800
	annual	0.3	--	2000	312470	3748150	<0.01	--	2001	333230	3763600

Note (1): Max. uncorrected 1-hour average NOx concentration. Maximum ozone-limited 1-hour average NOx concentration of 187.9 ug/m3  
on 5/1/2001, hour 19, at 311170, 3747650.





**G7-2**

**Air Quality Impact Assessment of the Startup  
Operations at the BHP Cabrillo Deepwater Port LNG  
Import Terminal**



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# **Air Quality Impact Assessment of Startup Operations at the BHP Cabrillo Deepwater Port LNG Import Terminal**

prepared for:

**BHP Billiton**

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## Revised Assessment of Air Quality Impacts of Startup Activities

The assessment of air quality impacts associated with FSRU startup activities has been revised to reflect the updated assumptions and emission factors provided on September 21.

The OCD model was used with five years of meteorological data to assess the air quality impacts associated with FSRU startup activities. For this analysis, it was assumed that the startup period would last for 60 days (9 weeks for weekly activities) and that normal operation would occur for the remaining 305 days (43 weeks for weekly activities). Short-term emission rates for modeling were calculated based on maximum hourly emission rates for startup activities, as follows:

- Two Wartsila 9L50DF generators operate on Diesel fuel at 75% load, 24 hours per day;
- SCVs do not operate during the startup period;
- Tug/supply boats travel to the FSRU once per week;
- Crew boats make 6 trips per week to the FSRU; and
- LNG carriers do not visit the FSRU during the startup period.

During the startup year it was assumed that there would be 82 small (138 m<sup>3</sup>) LNG carrier calls. This was calculated assuming 43 weeks of normal FSRU operation following the startup period.

$$99 \text{ carrier visits}/52 \text{ weeks} * 43 \text{ weeks} = 81.8 \text{ carrier visits (rounded to 82)}$$

As before, vessel activity was allocated to District waters, to the FSRU safety zone, and to Federal waters between the District waters boundary and the FSRU. Activity assumptions are summarized in Table 1.

**Table 1**  
**Vessel Activity by Area During the Startup Period**

Vessel Type/Area	Assumed Activity
<b><i>Averaging Period: 1 hour</i></b>	
Assist Tugs, District Waters	½ hour
Crew Boat, District Waters	½ hour
Assist Tugs, FW1	½ hour
Crew Boat, FW1	½ hour
<b><i>Averaging Period: 3 hours</i></b>	
Assist Tugs, District Waters	1 hour
Crew Boat, District Waters	1 hour
Assist Tugs, FW1	1 hour
Crew Boat, FW1	1 hour
Assist Tugs, FW2	1 hour
Crew Boat, FW2	1 hour

**Table 1**  
**Vessel Activity by Area During the Startup Period**

<b>Vessel Type/Area</b>	<b>Assumed Activity</b>
<b><i>Averaging Period: 8 hours</i></b>	
Assist Tugs, District Waters	1 hour
Crew Boat, District Waters	1.05 hour
Assist Tugs, FW1	2 hours
Crew Boat, FW1	2 hours
Assist Tugs, FW2	5 hours
Crew Boat, FW2	5 hours
<b><i>Averaging Period: 24 hours</i></b>	
Assist Tugs, District Waters	1 hour
Crew Boat, District Waters	1.05 hour
Assist Tugs, FW1	2 hours
Crew Boat, FW1	2 hours
Assist Tugs, FW2	21 hours
Crew Boat, FW2	5 hours
<b><i>Averaging Period: Annual</i></b>	
Assist Tugs, District Waters	52 hours
Crew Boat, District Waters	229 hours
Assist Tugs, FW1	104 hours
Crew Boat, FW1	436 hours
Assist Tugs, FW2	8419 hours
LNG Carrier, FW2	1337 hours
Crew Boat, FW2	1090 hours
Assist Tugs, FW3	163 hours
LNG Carrier, FW3	377 hours

Details regarding emission rates, engine loads, stack parameters and modeling inputs are provided in the attachments. Sample emissions calculations are also provided. Major changes since the previous submittal are as follows:

- As assist tugs and crew boats will be Diesel fueled during normal project operation, the same vessels will be used during startup and normal project operation so there is no difference in emission factors between the two periods. However, it is still assumed that there will be additional crew boat activity during the startup period.
- LNG carrier pumping emissions have been allocated to the FSRU for modeling purposes.

The results of the OCD modeling are summarized and compared with the applicable state and federal ambient air quality standards in Tables 2, 3, and 4.

**Table 2**  
**Maximum Modeled Project Impacts During the Startup Period (Stationary Sources and Marine Vessels)**

Pollutant	Avg Period	Max. Modeled Offshore Impact ( $\mu\text{g}/\text{m}^3$ )	Max. Modeled Onshore Impact ( $\mu\text{g}/\text{m}^3$ )	Max. Modeled Impact in SoCAB ( $\mu\text{g}/\text{m}^3$ )
NO <sub>2</sub> <sup>a</sup>	1-hour	177.6	40.8	11.4
	annual	2.0	<0.1	<0.1
SO <sub>2</sub>	1-hour	0.3	0.1	<0.1
	3-hour	0.1	<0.1	<0.1
	24-hour	<0.1	<0.1	<0.1
	annual	<0.1	<0.1	<0.1
CO	1-hour	98.6	17.4	4.9
	8-hour	14.2	1.0	0.3
PM <sub>10</sub> /PM <sub>2.5</sub>	24-hour	0.8	0.1	<0.1
	annual	0.2	<0.1	<0.1

Note: a. To be conservative, all NO<sub>x</sub> is assumed to be NO<sub>2</sub> in evaluating ambient impacts.

**Table 3**  
**Comparison of Maximum Modeled Project Offshore Impacts During Startup Period with Ambient Air Quality Standards**

Pollutant	Avg Period	Max. Modeled Offshore Impact ( $\mu\text{g}/\text{m}^3$ )	Background Conc. ( $\mu\text{g}/\text{m}^3$ ) <sup>a</sup>	Total Impact ( $\mu\text{g}/\text{m}^3$ )	State Standard ( $\mu\text{g}/\text{m}^3$ )	Federal Standard ( $\mu\text{g}/\text{m}^3$ )
NO <sub>2</sub>	1-hour	177.6	139.1	316.7	470	--
	annual	2.0	26	28	--	100
SO <sub>2</sub>	1-hour	0.3	39.3	39.6	655	--
	3-hour	0.1	39	39	--	1,300
	24-hour	<0.1	23.5	23.5	105	365
	annual	<0.1	10.7	10.7	--	80
CO	1-hour	98.6	8,280	8,379	23,000	40,000
	8-hour	14.2	4,000	4,014	10,000	10,000
PM <sub>10</sub>	24-hour	0.8	127.2	128	50	150
	annual	0.2	29	29	20	50
PM <sub>2.5</sub>	24-hour	0.8	32 <sup>b</sup>	33	--	65
	annual	0.2	13	13	12	15

Note: <sup>a</sup> Background values from El Rio monitoring station (Station ID No. 061113001).

<sup>b</sup> Background values for PM<sub>2.5</sub> based on 98<sup>th</sup> percentile.

**Table 4**  
**Comparison of Maximum Modeled Project Onshore Impacts During the Startup Period with**  
**Ambient Air Quality Standards**

<b>Pollutant</b>	<b>Avg Period</b>	<b>Max. Modeled Onshore Impact (<math>\mu\text{g}/\text{m}^3</math>)</b>	<b>Background Conc. (<math>\mu\text{g}/\text{m}^3</math>)<sup>a</sup></b>	<b>Total Impact (<math>\mu\text{g}/\text{m}^3</math>)</b>	<b>State Standard (<math>\mu\text{g}/\text{m}^3</math>)</b>	<b>Federal Standard (<math>\mu\text{g}/\text{m}^3</math>)</b>
NO <sub>2</sub>	1-hour	40.8	139.1	179.9	470	--
	annual	<0.1	26	26	--	100
SO <sub>2</sub>	1-hour	0.1	39.3	39.4	655	--
	3-hour	<0.1	39	39	--	1,300
	24-hour	<0.1	23.5	23.5	105	365
	annual	<0.1	10.7	10.7	--	80
CO	1-hour	17.4	8,280	8,297	23,000	40,000
	8-hour	1.0	4,000	4,001	10,000	10,000
PM <sub>10</sub>	24-hour	0.1	127.2	127.3	50	150
	annual	<0.1	29	29	20	50
PM <sub>2.5</sub>	24-hour	0.1	32 <sup>b</sup>	32	--	65
	annual	<0.1	13	13	12	15

Note: <sup>a</sup> Background values from El Rio monitoring station (Station ID No. 061113001).

<sup>b</sup> 24-hour average background value for PM<sub>2.5</sub> based on 98<sup>th</sup> percentile.



## **Attachments**

**Documentation for Emissions Calculations**

**Release Parameters for FSRU Sources**

**Stack Parameters for FSRU Sources During the Startup Year**

**Maximum Hourly Emission Rates for Tug Supply Mains**

**Maximum Hourly Emission Rates for Tug Supply Gens**

**Maximum Hourly Emission Rates for Crew Boat Mains**

**Maximum Hourly Emission Rates for Crew Boat Gens**

**Maximum Hourly Emission Rates for LNG Carrier**

**Support Vessel Emissions in District Waters During the Startup Year**

**Vessel Emissions and Activity in Federal Waters During the Startup Year**

**Release Parameters for Support Vessels During the Startup Year**

**Stack Parameters for Vessel Activity During the Startup Year**



## Documentation for Emissions Calculations

### FSRU Sources

#### Startup Diesel Generators

- hourly emissions from “FSRU Startup Table 5”, FSRU Startup Emissions 6 12 06.xls
- annual emissions from “FSRU Startup Table 2”, FSRU Startup Emissions 6 12 06.xls

#### Vaporizers

- do not operate during the startup period, so no short-term emissions modeled
- annual emissions from “Table FSRU 9”, FSRU operational Version 6 9-15-06.xls, adjusted to reflect 7320 hours of operation during the startup year (305 days times 24 hrs/day)

#### Emergency Generator

- hourly emissions from “FSRU Startup Table 7”, FSRU Startup Emissions 6 12 06.xls
- annual emissions from “FSRU Startup Table 2”, FSRU Startup Emissions 6 12 06.xls

#### Fire Pump Engine

- hourly emissions from “FSRU Startup Table 7”, FSRU Startup Emissions 6 12 06.xls
- annual emissions from “FSRU Startup Table 2”, FSRU Startup Emissions 6 12 06.xls

#### Life Boat

- hourly emissions from “FSRU Startup Table 8”, FSRU Startup Emissions 6 12 06.xls
- annual emissions from “FSRU Startup Table 2”, FSRU Startup Emissions 6 12 06.xls

#### Main Generators

- annual emissions from “Table FSRU 5”, FSRU operational Version 6 9-15-06.xls, adjusted to reflect 7320 hours of operation during the startup year (305 days times 24 hrs/day)

#### Backup Generator

- annual emissions from “Table FSRU 7”, FSRU operational Version 6 9-15-06.xls, adjusted to reflect 85 hours of operation during the startup year (305 days/365 days \* 100 hrs = 83.6, rounded up to 85)

#### LNG Carrier (pumping)

- annual emissions from “Table FSRU 16”, FSRU operational Version 6 9-15-06.xls, adjusted to reflect 82 berthings during the startup year (43 weeks/52 weeks \* 99 berthings = 81.8, rounded up to 82)

## Vessels

### **Assist Tugs, Crew Boat and LNG Carrier**

- **Maximum hourly emissions for each engine and vessel type were calculated from Tables FW 2, FW 3, FW 5, FW 6 and FW 8 of Federal Waters version 9-29-06.xls by setting the load factor in cell B9 of each table to 100%. The resulting full load hourly emission rates are shown on the attached copies of the modified tables.**
- **Actual hourly emission rates for each vessel type were calculated using the engine loads shown in the table notes for “Support Vessels in District Waters During the Startup Year” and in the table body for “Vessel Emissions and Activity in Federal Waters During the Startup Period.”**

**For example, full load NOx emissions for tug supply mains are 55.24 lb/hr and for tug supply gens is 0.173 lb/hr. Hourly NOx emissions for assist tugs in FW1, based on 51% load on the main engines and 50% load on the generators, is calculated as:**

$$(0.51 * 55.24) = (0.50 * 0.173) = 28.26 \text{ lb/hr}$$

- **Emission rates for other averaging periods were calculated using the persistence factors in Table 1 above (“Vessel Activity by Area During the Startup Period”).**

Release Parameters for FSRU Sources

Release Parameter	Units	Main Gens	Backup Gen	Vaporizers	Emerg. Pump	Emerg. Gen	Life Boat	Startup	LNG Carrier Pumps
Fuel	Type	Dual Fuel	Diesel	Gas	Diesel	Diesel	Diesel	Diesel	Dual Fuel
Heat Input	mmBTU/hr	197.1	66.3	460.0	5.9	35.8	0.64	99.52	31.8
Wet Fd Factor	wscf/mmBTU	10,608	10,320	10,610	10,320	10,320	10,320	10,320	10,608
Oxygen Content	percent	15%	15%	3%	15%	15%	15%	15%	15%
Exhaust Temperature	Deg F	800	800	70	800	800	800	800	800
Stack Diameter (each)	inches	39.37	39.37	39.37	10.0	26.0	3.0	39.37	31.50
Number of Active Stacks	each	3	1	4	1	1	1	2	1
Stack Diameter (combined)	inches	68.2	39.4	78.7	10.0	26.0	3.0	55.7	31.5
Stack Area	sq. ft.	25.36	8.45	33.82	0.55	3.69	0.05	16.91	5.41
Stack Flow	wscf/min	123,434	40,424	94,976	3,565	21,835	388	60,636	19,947
Stack Flow	wacf/min	294,558	96,467	95,336	8,507	52,106	926	144,700	47,600
Stack Velocity	ft/min	11,614	11,411	2,819	15,597	14,132	18,871	8,558	8,798

Release Height	meters	33	33	35	25	25	1	33	44
Release Diameter (h)	meters	1.73	1.00	2.00	0.25	0.66	0.08	1.41	0.80
Release Velocity	meters/sec	59.0	58.0	14.3	79.2	71.8	95.9	43.5	44.7
Release Temperature (T)	degrees K	700	700	294	700	700	700	700	700
Release Flowrate (V)	wacm/sec	139.01	45.53	44.99	4.01	24.59	0.44	68.29	22.46

Downwash Dimensions	Units	FSRU Hull
Height	meters	21
Width (min horizontal)	meters	65
Length (max horizontal)	meters	286

**Emission Rates and Stack Parameters for Refined Modeling**  
**BHP Cabrillo LNG Deepwater Port: FSRU Sources During Startup Period**

						Emission Rate, g/s									Emission Rate, lb/hr			
	Stack Diam, m	Stack Height, m	Exh Temp, Deg K	Exhaust Flow, m3/s	Exhaust Velocity, m/s	NOx	SO2	CO	PM10	Stack Diam, ft	Stack Height, ft	Exh Temp, Deg F	Exh Flow Rate, ft3/m	Exhaust Velocity, ft/s	NOx	SO2	CO	PM10
Averaging Period: 1 hour																		
Startup Diesel generators (total)	1.414	33.000	699.67	68.29	43.475	7.310	1.949E-02	0.742	n/a	4.6	108.3	800	144,700	142.6	58.02	0.15	5.89	n/a
Vaporizers (total)	2.000	35.000	294.11	44.994	14.322	0	0	0	n/a	6.56	114.8	70	95,336	47.0	0.00	0.00	0.00	n/a
Emergency generator	0.660	25.000	699.67	24.591	71.792	6.533	7.019E-03	4.083	n/a	2.17	82.0	800	52,106	235.5	51.85	0.06	32.41	n/a
Fire pump	0.254	25.000	699.67	4.015	79.235	0.933	1.146E-03	0.583	n/a	0.83	82.0	800	8,507	260.0	7.41	0.01	4.63	n/a
Life boat	0.076	1.000	699.67	0.437	95.864	0.101	1.248E-04	7.778E-02	n/a	0.25	3.3	800	926	314.5	0.80	0.00	0.62	n/a
Averaging Period: 3 hours																		
Startup Diesel generators (total)	1.414	33.000	699.67	68.29	43.475	n/a	1.949E-02	n/a	n/a	4.6	108.3	800	144,700	142.6	n/a	0.15	n/a	n/a
Vaporizers (total)	2.000	35.000	294.11	44.994	14.322	n/a	0	n/a	n/a	6.56	114.8	70	95,336	47.0	n/a	0.00	n/a	n/a
Emergency generator	0.660	25.000	699.67	24.591	71.792	n/a	2.340E-03	n/a	n/a	2.17	82.0	800	52,106	235.5	n/a	0.02	n/a	n/a
Fire pump	0.254	25.000	699.67	4.015	79.235	n/a	3.820E-04	n/a	n/a	0.83	82.0	800	8,507	260.0	n/a	0.00	n/a	n/a
Life boat	0.076	1.000	699.67	0.437	95.864	n/a	4.159E-05	n/a	n/a	0.25	3.3	800	926	314.5	n/a	0.00	n/a	n/a
Averaging Period: 8 hours																		
Startup Diesel generators (total)	1.414	33.000	699.67	68.29	43.475	7.310	n/a	0.742	n/a	4.64	108.3	800	144,700	142.6	58.02	n/a	5.89	n/a
Vaporizers (total)	2.000	35.000	294.11	44.994	14.322	0	n/a	0	n/a	6.56	114.8	70	95,336	47.0	0.00	n/a	0.00	n/a
Emergency generator	0.660	25.000	699.67	24.591	71.792	0.817	n/a	0.510	n/a	2.17	82.0	800	52,106	235.5	6.48	n/a	4.05	n/a
Fire pump	0.254	25.000	699.67	4.015	79.235	0.117	n/a	7.292E-02	n/a	0.83	82.0	800	8,507	260.0	0.93	n/a	0.58	n/a
Life boat	0.076	1.000	699.67	0.437	95.864	1.264E-02	n/a	9.722E-03	n/a	0.25	3.3	800	926	314.5	0.10	n/a	0.08	n/a
Averaging Period: 24 hours																		
Startup Diesel generators (total)	1.414	33.000	699.67	68.29	43.475	n/a	1.949E-02	n/a	0.535	4.64	108.3	800	144,700	142.6	n/a	0.15	n/a	4.25
Vaporizers (total)	2.000	35.000	294.11	44.994	14.322	n/a	0	n/a	0	6.56	114.8	70	95,336	47.0	n/a	0.00	n/a	0.00
Emergency generator	0.660	25.000	699.67	24.591	71.792	n/a	2.924E-04	n/a	9.722E-03	2.17	82.0	800	52,106	235.5	n/a	2.32E-03	n/a	0.08
Fire pump	0.254	25.000	699.67	4.015	79.235	n/a	4.775E-05	n/a	1.389E-03	0.83	82.0	800	8,507	260.0	n/a	3.79E-04	n/a	0.01
Life boat	0.076	1.000	699.67	0.437	95.864	n/a	5.199E-06	n/a	2.593E-04	0.25	3.3	800	926	314.5	n/a	4.13E-05	n/a	0.00
Averaging Period: Annual																		
Main generators (total)	1.732	33.000	699.67	139.02	59.000	0.295	1.843E-03	n/a	0.195	5.68	108.3	800	294,558	193.6	2.34	0.01	n/a	1.55
Startup Diesel generators (total)	1.414	33.000	699.67	68.29	43.475	1.202	3.204E-03	n/a	0.088	4.64	108.3	800	144,700	142.6	9.54	0.03	n/a	0.70
Backup generator	1.000	33.000	699.67	45.53	57.967	0.047	1.261E-04	n/a	3.424E-03	3.28	108.3	800	96,467	190.2	0.38	0.00	n/a	0.03
Vaporizers (total)	2.000	35.000	294.11	44.994	14.322	1.176	7.984E-03	n/a	9.133E-02	6.56	114.8	70	95,336	47.0	9.33	0.06	n/a	0.72
Emergency generator	0.660	25.000	699.67	24.591	71.792	7.458E-02	8.012E-05	n/a	2.664E-03	2.17	82.0	800	52,106	235.5	0.59	6.36E-04	n/a	0.02
Fire pump	0.254	25.000	699.67	4.015	79.235	1.065E-02	1.308E-05	n/a	3.805E-04	0.83	82.0	800	8,507	260.0	0.08	1.04E-04	n/a	3.0E-03
Life boat	0.076	1.000	699.67	0.437	95.864	5.771E-04	7.122E-07	n/a	3.552E-05	0.25	3.3	800	926	314.5	0.00	5.65E-06	n/a	2.8E-04
LNG Carrier (pumping)	0.800	44.00	699.67	22.465	44.692	2.232E-01	7.813E-05	n/a	9.852E-03	2.62	144.36	800	47,600	146.6	1.77	6.20E-04	n/a	0.08

Maximum Hourly Emission Rates for Tug Supply Mains

SIC	1321		
PROCESS EQPT DESCRIPTION	Tug Supply Main Generator Set Engines, 15,000 BHP, 2 vessels alternating port calls		
FUEL TYPE/PROCESS INFO	CA Diesel, 15 ppm S		
TOTAL YEARLY PROCESS RATE	21242	MW-hrs	
HOURLY PROCESS RATE	11.19	MW	
PROCESS UNITS	PT071	MW-hrs	
HIGHER HEATING VALUE	1007.6	BTU/cu ft	
COMBINED ENGINE RATING	15000	BHP	from BHP estimates
LOAD FACTOR	100%	percent	
OPERATING SCHEDULE	8738	hrs/yr	per vessel during startup year
HEAT RATE	9751	BTU/KW-hr	
CONVERSION EFFICIENCY	35.0%	percent	
HEAT INPUT	109.08	mmBTU/hr	
DRY Fd	9190	dscf/mmBTU	USEPA Method 19
EXHAUST FLOW	3.55	mmdscf/hr	

EMITTENT NAME	EMITTENT PPMV	CTL EF LBS/UNIT	2 vessels based on 100% load		MAXIMUM LBS/HR	RATE g/kw-hr	RATE g/bhp-hr	
Nitrogen Oxides (as NO <sub>2</sub> )	65	2.4692			55.24	1.120	0.835	
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	80	1.0582			23.67	0.480	0.358	
Carbon Monoxide (CO)	100	2.3149			51.79	1.050	0.783	
Sulfur Dioxide (SO <sub>2</sub> )	0.29	0.0152			0.34	0.007	0.005	
Particulates (as PM <sub>10</sub> ) (grains/dscf)	0.0029	0.1323			2.96	0.060	0.045	
Carbon Dioxide (CO <sub>2</sub> )	4.44%	1608.9857			35995.21	730	544	

### Maximum Hourly Emission Rates for Tug Supply Gens

SIC	1321	
PROCESS EQPT DESCRIPTION	Tug Supply Auxiliary Generator, 150 BHP, 2 vessels alternating port calls	
FUEL TYPE/PROCESS INFO	CA Diesel, 15 ppm S	
TOTAL YEARLY PROCESS RATE	966	MW-hrs
HOURLY PROCESS RATE	0.11	MW
PROCESS UNITS	PT071	MW-hrs
HIGHER HEATING VALUE	1007.6	BTU/cu ft
COMBINED ENGINE RATING	150	BHP from BHP estimates
LOAD FACTOR	100%	percent
OPERATING SCHEDULE	8738	hrs/yr per vessel during startup year
HEAT RATE	9751	BTU/KW-hr
CONVERSION EFFICIENCY	35.0%	percent
HEAT INPUT	1.09	mmBTU/hr
DRY Fd	9190	dscf/mmBTU USEPA Method 19
EXHAUST FLOW	0.04	mmdscf/hr

EMITTENT NAME	EMITTENT PPMV	CTL EF LBS/UNIT			2 vessels MAXIMUM LBS/HR	RATE g/kw-hr	RATE g/bhp-hr
Nitrogen Oxides (as NO <sub>2</sub> )	41	1.5432			0.173	0.700	0.522
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	50	0.6614			0.074	0.300	0.224
Carbon Monoxide (CO)	143	3.3070			0.370	1.500	1.119
Sulfur Dioxide (SO <sub>2</sub> )	0.29	0.0152			0.002	0.007	0.005
Particulates (as PM <sub>10</sub> ) (grains/dscf)	0.0044	0.1984			0.022	0.090	0.067
Carbon Dioxide (CO <sub>2</sub> )	4.44%	1608.9857			179.976	730	544



### Maximum Hourly Emissions for Crew Boat Mains

SIC	1321		
PROCESS EQPT DESCRIPTION	Crew Boat Main Engines, 1500 BHP		
FUEL TYPE/PROCESS INFO	CA Diesel, 15 ppm S		
TOTAL YEARLY PROCESS RATE	1963	MW-hrs	
HOURLY PROCESS RATE	1.12	MW	
PROCESS UNITS	PT071	MW-hrs	
HIGHER HEATING VALUE	1007.6	BTU/cu ft	Scarborough LNG
COMBINED ENGINE RATING	1500	BHP	from BHP estimates
LOAD FACTOR	100%	percent	
OPERATING SCHEDULE	1755	hrs/yr	during startup year
HEAT RATE	9751	BTU/KW-hr	
CONVERSION EFFICIENCY	35.0%	percent	
HEAT INPUT	10.91	mmBTU/hr	
DRY Fd	9190	dscf/mmBTU	USEPA Method 19
EXHAUST FLOW	0.36	mmdscf/hr	

EMITTENT NAME	EMITTENT PPMV	CTL EF LBS/UNIT			100% LOAD MAXIMUM LBS/HR	RATE* g/kw-hr	RATE g/bhp-hr
Nitrogen Oxides (as NO <sub>2</sub> )	65	2.4692			2.76	1.120	0.835
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	80	1.0582			1.18	0.480	0.358
Carbon Monoxide (CO)	100	2.3149			2.59	1.050	0.783
Sulfur Dioxide (SO <sub>2</sub> )	0.29	0.0152			0.02	0.007	0.005
Particulates (as PM <sub>10</sub> ) (grains/dscf)	0.0029	0.1323			0.15	0.060	0.045
Carbon Dioxide (CO <sub>2</sub> )	4.44%	1608.9857			1,800	730	544

### Maximum Hourly Emission Rates for Crew Boat Gens

SIC	1321		
PROCESS EQPT DESCRIPTION	Crew Boat Generator Engine, 150 BHP		
FUEL TYPE/PROCESS INFO	CA Diesel, 15 ppm S		
TOTAL YEARLY PROCESS RATE	196	MW-hrs	
HOURLY PROCESS RATE	0.11	MW	
PROCESS UNITS	PT071	MW-hrs	
HIGHER HEATING VALUE	1007.6	BTU/cu ft	Scarborough LNG
COMBINED ENGINE RATING	150	BHP	from BHP estimates
LOAD FACTOR	100%	percent	
OPERATING SCHEDULE	1755	hrs/yr	during startup year
HEAT RATE	9751	BTU/KW-hr	
CONVERSION EFFICIENCY	35.0%	percent	
HEAT INPUT	1.09	mmBTU/hr	
DRY Fd	9190	dscf/mmBTU	USEPA Method 19
EXHAUST FLOW	0.036	mmdscf/hr	

EMITTENT NAME	EMITTENT PPMV	CTL EF LBS/UNIT			100% LOAD MAXIMUM LBS/HR	RATE* g/kw-hr	RATE g/bhp-hr
Nitrogen Oxides (as NO <sub>2</sub> )	41	1.5432			0.17	0.700	0.522
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	50	0.6614			0.07	0.300	0.224
Carbon Monoxide (CO)	143	3.3070			0.37	1.500	1.119
Sulfur Dioxide (SO <sub>2</sub> )	0.29	0.0152			0.00	0.007	0.005
Particulates (as PM <sub>10</sub> ) (grains/dscf)	0.0044	0.1984			0.02	0.090	0.067
Carbon Dioxide (CO <sub>2</sub> )	4.44%	1608.9857			180	730	544

# Maximum Hourly Emission Rates for LNG Carrier

SIC 1321  
 PROCESS EQPT DESCRIPTION LNG Carrier, 44,000 KW Total  
 FUEL TYPE/PROCESS INFO Scarborough LNG, 99.7% methane, 1 ppmv S & 15 ppmw S California diesel pilot charge  
 TOTAL YEARLY PROCESS RATE 56562 MW-hrs  
 HOURLY PROCESS RATE 33.00 MW  
 PROCESS UNITS PT071 MW-hrs  
 HIGHER HEATING VALUE 1007.6 BTU/cu ft Scarborough LNG  
 COMBINED ENGINE RATING 33000 KW from activity profile  
 LOAD FACTOR 100% percent  
 OPERATING SCHEDULE 1714 hrs/yr based on 82 berthings during startup year  
 HEAT RATE 8533 BTU/KW-hr  
 CONVERSION EFFICIENCY 40.0% percent  
 HEAT INPUT 281.57 mmBTU/hr  
 DRY Fd 8714 dscf/mmBTU USEPA Method 19  
 EXHAUST FLOW 8.69 mmdscf/hr

EMITTENT NAME	EMITTENT PPMV	CTL EF LBS/UNIT	100% LOAD MAXIMUM LBS/HR	RATE g/kw-hr	RATE g/bhp-hr
Nitrogen Oxides (as NO <sub>2</sub> )	140	4.4093	145.51	2.000	1.491
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	116	1.2669	41.81	0.575	0.429
Carbon Monoxide (CO)	163	3.1159	102.82	1.413	1.054
Sulfur Dioxide (SO <sub>2</sub> )	0.04	0.0015	0.05	0.0007	0.0005
Particulates (as PM <sub>10</sub> ) (grains/dscf)	0.0052	0.1946	6.42	0.0883	0.066
Carbon Dioxide (CO <sub>2</sub> )	4.34%	1305.1434	43,070	592	441

Support Vessel Emissions in District Waters  
During the Startup Year

Pollutant	Period	Source	
		Tug Supply	Crew Boat
NOx	lb/hr	16.7	1.2
	lb/day	16.7	1.3
	tons/yr	0.22	0.14
SOx	lb/hr	1.03E-01	7.8E-03
	lb/day	1.0E-01	8.2E-03
	tons/yr	1.345E-03	8.93E-04
CO	lb/hr	15.721	1.247
	lb/day	15.721	1.309
	tons/yr	0.21	0.14
PM10	lb/hr	0.9	7.2E-02
	lb/day	0.9	7.5E-02
	tons/yr	1.18E-02	8.21E-03

Tug Supply:                   1.0 hr/day  
                                      52 trips/yr  
                                      52 hrs/yr

Crew Boat:                   1.05 hrs/day  
                                      218 trips/yr  
                                      229 hrs/yr

Vessel Notes:

Tug Supply boats making 52 1-hr round trips to FSRU per year, time & load weighted engine operation (normal schedule)

Crew boat making 218 1.05-hr round trips to FSRU per year, time & load weighted engine operation (6 rt/wk x 9 wks during startup period and 2 x 82 carrier visits for remainder of year)

Operating component in state waters only (inside 3-mile limit)

Each vessel makes 1 RT on 1 day.

Each vessel transits District waters in 1/2 hr.

Tug supply vessel travels from FSRU to dock and return: 1 hr in DW in 8-hr prd.

Crew boat travels from dock to FSRU and return: 1.05 hr in DW in 8-hr prd.

Vessel Emissions and Activity in Federal Waters  
During the Startup Year

	NOx	SOx	CO	PM10
<b>Vessel Activity between District Water Boundary and FSRU (FW1)</b>				
Assist Tugs (51% engine load on mains; 50% on gens)				
Hours/yr	104 same activity as operating year			
Emissions, lb/hr	28.26	0.174	26.60	1.520
Emissions, tpy	1.47	0.009	1.38	0.08
Crew Boat (90% engine load on mains; 50% on gens)				
Hours/yr	436 6 trips/wk during startup plus 2 rt/berthing			
Emissions, lb/hr	2.57	0.016	2.52	0.144
Emissions, tpy	0.561	0.004	0.548	0.03
<b>Vessel Activity at FSRU (FW2)</b>				
LNG Carrier (4.42% engine load)				
Hours/yr	1337 based on 82 berthings during startup yr			
Emissions, lb/hr	6.43	2.24E-03	4.52	0.283
Emissions, tpy	4.3	1.50E-03	3.0	0.2
Assist Tugs (10% engine load on mains; 50% on gens)				
Hours/yr	8419 same activity as operating year			
Emissions, lb/hr	5.61	0.035	5.36	0.31
Emissions, tpy	23.6	0.1	22.6	1.3
Crew Boat (19% engine load on mains; 50% on gens)				
Hours/yr	1090 6 trips/wk during startup plus 2 rt/berthing			
Emissions, lb/hr	0.61	0.004069	0.68	0.03921
Emissions, tpy	0.333	0.002	0.37	0.02
<b>Vessel Activity Between FSRU and Federal Waters Boundary (FW3)</b>				
LNG Carrier (48% engine load)				
Hours/yr	377 based on 82 berthings during startup yr			
Emissions, lb/hr	69.84	0.02	49.36	3.08
Emissions, tpy	13.2	0.005	9.3	0.6
Assist Tugs (45% engine load on mains; 50% on gens)				
Hours/yr	163 same activity as operating year			
Emissions, lb/hr	24.94	0.15	23.49	1.34
Emissions, tpy	2.0	0.0	1.9	0.1
Total Emissions in Federal Waters				
Assist Tugs	27.1	0.17	25.9	1.5
Crew Boat	0.9	0.01	0.9	0.1
LNG Carrier	17.5	0.01	12.3	0.8
Total	45.5	0.18	39.1	2.3

### Release Parameters for Support Vessels During the Startup Year

Release Parameter	Units	Tug Supply	Crew Boat	Small LNG Carrier
Fuel	Type	Diesel	Diesel	Dual Fuel
Total Engine Rating	BHP	15000	1500	44253
Average Load	percent	30%	47%	14%
Heat Input	mmBTU/hr	32.7	5.1	39.42
Wet Fd Factor	wscf/mmBTU	10,320	10,320	10608
Oxygen Content	percent	15%	15%	15%
Exhaust Temperature	Deg F	800	800	800
Effective Stack Diameter	inches	30.6	13.0	31.5
Stack Height	feet	29.5	16.4	144.4
Stack Area	sq. ft.	5.11	0.92	5.41
Stack Flow	wscf/min	19,938	3,124	24,688
Stack Flow	wacf/min	47,579	7,454	58,916
Stack Velocity	ft/min	9,316	8,087	10,890
	ft/sec	155	135	182
	mph	105.87	91.89	123.75
Release Height	meters	9.000	5.000	44
Eff Release Diameter	meters	0.78	0.33	0.80
Release Velocity	meters/sec	47.3	41.1	55.3
Release Temperature	degrees K	700	700	700

Total Engine Rating is total rating of all vessel engines.

Effective stack diameter is equivalent diameter of 4 tug supply stacks.

Heat input is average hourly heat input based on average load on main engine(s) while operating in District waters.

Stack Parameters for Vessel Activity  
During the Startup Year

	Effective Stack Diam, m	Stack Height, m	Exh Temp, Deg K	Exhaust Flow, m3/s	Exhaust Velocity, m/s	Emission Rate, g/s			
						NOx	SO2	CO	PM10
Averaging Period: 1 hour									
Assist Tugs DW	0.777	9.000	699.67	22.45	47.327	1.049	6.462E-03	0.990	n/a
Crew Boat DW	0.330	5.000	699.67	3.52	41.081	0.077	4.914E-04	0.079	n/a
Assist Tugs FW1	0.777	9.000	699.67	22.45	47.327	1.780	1.095E-02	1.676	n/a
Crew Boat FW1	0.330	5.000	699.67	3.52	41.081	0.162	1.015E-03	0.158	n/a
Assist Tugs FW2	0.777	9.000	699.67	22.45	47.327	0	0	0	n/a
LNG Carrier FW2	0.800	44.000	699.67	27.81	55.303	0	0	0	n/a
Crew Boat FW2	0.330	5.000	699.67	3.52	41.081	0	0	0	n/a
Assist Tugs FW3	0.777	9.000	699.67	22.45	47.327	0	0	0	n/a
LNG Carrier FW3	0.800	44.000	699.67	27.81	55.303	0	0	0	n/a
Averaging Period: 3 hours									
Assist Tugs DW	0.777	9.000	699.67	22.45	47.327	n/a	4.308E-03	n/a	n/a
Crew Boat DW	0.330	5.000	699.67	3.52	41.081	n/a	3.276E-04	n/a	n/a
Assist Tugs FW1	0.777	9.000	699.67	22.45	47.327	n/a	7.299E-03	n/a	n/a
Crew Boat FW1	0.330	5.000	699.67	3.52	41.081	n/a	6.765E-04	n/a	n/a
Assist Tugs FW2	0.777	9.000	699.67	22.45	47.327	n/a	1.460E-03	n/a	n/a
LNG Carrier FW2	0.800	44.000	699.67	27.81	55.303	n/a	0	n/a	n/a
Crew Boat FW2	0.330	5.000	699.67	3.52	41.081	n/a	1.709E-04	n/a	n/a
Assist Tugs FW3	0.777	9.000	699.67	22.45	47.327	n/a	0	n/a	n/a
LNG Carrier FW3	0.800	44.000	699.67	27.81	55.303	n/a	0	n/a	n/a
Averaging Period: 8 hours									
Assist Tugs DW	0.777	9.000	699.67	22.45	47.327	2.624E-01	n/a	2.476E-01	n/a
Crew Boat DW	0.330	5.000	699.67	3.52	41.081	2.015E-02	n/a	2.062E-02	n/a
Assist Tugs FW1	0.777	9.000	699.67	22.45	47.327	8.901E-01	n/a	8.378E-01	n/a
Crew Boat FW1	0.330	5.000	699.67	3.52	41.081	8.102E-02	n/a	7.923E-02	n/a
Assist Tugs FW2	0.777	9.000	699.67	22.45	47.327	0.442	n/a	0.422	n/a
LNG Carrier FW2	0.800	44.000	699.67	27.81	55.303	0.000	n/a	0	n/a
Crew Boat FW2	0.330	5.000	699.67	3.52	41.081	4.812E-02	n/a	5.331E-02	n/a
Assist Tugs FW3	0.777	9.000	699.67	22.45	47.327	0	n/a	0	n/a
LNG Carrier FW3	0.800	44.000	699.67	27.81	55.303	0	n/a	0	n/a
Averaging Period: 24 hours									
Assist Tugs DW	0.777	9.000	699.67	22.45	47.327	n/a	5.385E-04	n/a	4.719E-03
Crew Boat DW	0.330	5.000	699.67	3.52	41.081	n/a	4.299E-05	n/a	3.956E-04
Assist Tugs FW1	0.777	9.000	699.67	22.45	47.327	n/a	1.825E-03	n/a	1.596E-02
Crew Boat FW1	0.330	5.000	699.67	3.52	41.081	n/a	1.691E-04	n/a	1.515E-03
Assist Tugs FW2	0.777	9.000	699.67	22.45	47.327	n/a	3.832E-03	n/a	3.385E-02
LNG Carrier FW2	0.800	44.000	699.67	27.81	55.303	n/a	0	n/a	0
Crew Boat FW2	0.330	5.000	699.67	3.52	41.081	n/a	1.068E-04	n/a	1.029E-03
Assist Tugs FW3	0.777	9.000	699.67	22.45	47.327	n/a	0	n/a	0
LNG Carrier FW3	0.800	44.000	699.67	27.81	55.303	n/a	0	n/a	0
Averaging Period: Annual									
Assist Tugs DW	0.777	9.000	699.67	22.45	47.327	6.262E-03	3.868E-05	n/a	3.403E-04
Crew Boat DW	0.330	5.000	699.67	3.52	41.081	4.012E-03	2.568E-05	n/a	2.363E-04
Assist Tugs FW1	0.777	9.000	699.67	22.45	47.327	4.227E-02	2.600E-04	n/a	2.274E-03
Crew Boat FW1	0.330	5.000	699.67	3.52	41.081	1.613E-02	1.010E-04	n/a	9.047E-04
Assist Tugs FW2	0.777	9.000	699.67	22.45	47.327	0.679	4.209E-03	n/a	3.718E-02
LNG Carrier FW2	0.800	44.000	699.67	27.81	55.303	0.124	4.309E-05	n/a	5.433E-03
Crew Boat FW2	0.330	5.000	699.67	3.52	41.081	9.581E-03	6.380E-05	n/a	6.147E-04
Assist Tugs FW3	0.777	9.000	699.67	22.45	47.327	5.858E-02	3.604E-04	n/a	3.154E-03
LNG Carrier FW3	0.800	44.000	699.67	27.81	55.303	0.379	1.325E-04	n/a	1.671E-02

Stack Parameters for Vessel Activity  
During the Startup Year

	Effective Stack Diam, ft	Stack Height, ft	Exh Temp, Deg F	Exh Flow Rate, ft3/m	Exhaust Velocity, ft/s	Emission Rate, lb/hr			
						NOx	SO2	CO	PM10
Averaging Period: 1 hr									
Assist Tugs DW	2.55	29.5	800	47,579	155.3	8.33	5.1E-02	7.86	n/a
Crew Boat DW	1.08	16.4	800	7,454	134.8	0.61	3.9E-03	0.62	n/a
Assist Tugs FW1	2.55	29.5	800	47,579	155.3	14.13	8.7E-02	13.30	n/a
Crew Boat FW1	1.08	16.4	800	7,454	134.8	1.29	8.1E-03	1.26	n/a
Assist Tugs FW2	2.55	29.5	800	47,579	155.3	0.00	0.0	0.00	n/a
LNG Carrier FW2	2.63	144.4	800	58,916	181.4	0.00	0.0	0.00	n/a
Crew Boat FW2	1.08	16.4	800	7,454	134.8	0.00	0.00	0.00	n/a
Assist Tugs FW3	2.55	29.5	800	47,579	155.3	0.00	0.00	0.00	n/a
LNG Carrier FW3	2.63	144.4	800	58,916	181.4	0.00	0.00	0.00	n/a
Averaging Period: 3 hr									
Assist Tugs DW	2.55	29.5	800	47,579	155.3	n/a	3.42E-02	n/a	n/a
Crew Boat DW	1.08	16.4	800	7,454	134.8	n/a	2.60E-03	n/a	n/a
Assist Tugs FW1	2.55	29.5	800	47,579	155.3	n/a	5.79E-02	n/a	n/a
Crew Boat FW1	1.08	16.4	800	7,454	134.8	n/a	5.37E-03	n/a	n/a
Assist Tugs FW2	2.55	29.5	800	47,579	155.3	n/a	1.2E-02	n/a	n/a
LNG Carrier FW2	2.63	144.4	800	58,916	181.4	n/a	0.0	n/a	n/a
Crew Boat FW2	1.08	16.4	800	7,454	134.8	n/a	1.4E-03	n/a	n/a
Assist Tugs FW3	2.55	29.5	800	47,579	155.3	n/a	0.0	n/a	n/a
LNG Carrier FW3	2.63	144.4	800	58,916	181.4	n/a	0.0	n/a	n/a
Averaging Period: 8 hr									
Assist Tugs DW	2.55	29.5	800	47,579	155.3	2.08	n/a	1.97	n/a
Crew Boat DW	1.08	16.4	800	7,454	134.8	0.16	n/a	0.16	n/a
Assist Tugs FW1	2.55	29.5	800	47,579	155.3	7.0646	n/a	6.649	n/a
Crew Boat FW1	1.08	16.4	800	7,454	134.8	0.64	n/a	0.63	n/a
Assist Tugs FW2	2.55	29.5	800	47,579	155.3	3.51	n/a	3.35	n/a
LNG Carrier FW2	2.63	144.4	800	58,916	181.4	0.00	n/a	0.00	n/a
Crew Boat FW2	1.08	16.4	800	7,454	134.8	0.38	n/a	0.42	n/a
Assist Tugs FW3	2.55	29.5	800	47,579	155.3	0.00	n/a	0.00	n/a
LNG Carrier FW3	2.63	144.4	800	58,916	181.4	0.00	n/a	0.00	n/a
Averaging Period: 24 hr									
Assist Tugs DW	2.55	29.5	800	47,579	155.3	n/a	4.3E-03	n/a	3.7E-02
Crew Boat DW	1.08	16.4	800	7,454	134.8	n/a	3.4E-04	n/a	3.1E-03
Assist Tugs FW1	2.55	29.5	800	47,579	155.3	n/a	1.4E-02	n/a	1.3E-01
Crew Boat FW1	1.08	16.4	800	7,454	134.8	n/a	1.3E-03	n/a	1.2E-02
Assist Tugs FW2	2.55	29.5	800	47,579	155.3	n/a	3.0E-02	n/a	2.7E-01
LNG Carrier FW2	2.63	144.4	800	58,916	181.4	n/a	0.0E+00	n/a	0.00
Crew Boat FW2	1.08	16.4	800	7,454	134.8	n/a	8.5E-04	n/a	8.2E-03
Assist Tugs FW3	2.55	29.5	800	47,579	155.3	n/a	0.0E+00	n/a	0.00
LNG Carrier FW3	2.63	144.4	800	58,916	181.4	n/a	0.0E+00	n/a	0.00
Averaging Period: Ann									
Assist Tugs DW	2.55	29.5	800	47,579	155.3	0.05	3.1E-04	n/a	2.70E-03
Crew Boat DW	1.08	16.4	800	7,454	134.8	0.03	2.0E-04	n/a	1.88E-03
Assist Tugs FW1	2.55	29.5	800	47,579	155.3	0.34	2.1E-03	n/a	1.80E-02
Crew Boat FW1	1.08	16.4	800	7,454	134.8	0.13	8.0E-04	n/a	0.01
Assist Tugs FW2	2.55	29.5	800	47,579	155.3	5.39	3.3E-02	n/a	0.30
LNG Carrier FW2	2.63	144.4	800	58,916	181.4	0.98	3.4E-04	n/a	0.04
Crew Boat FW2	1.08	16.4	800	7,454	134.8	0.08	5.1E-04	n/a	0.00
Assist Tugs FW3	2.55	29.5	800	47,579	155.3	0.46	2.9E-03	n/a	0.03
LNG Carrier FW3	2.63	144.4	800	58,916	181.4	3.00	1.1E-03	n/a	0.13